

TL674A RECONFIGURATION AND
TL666D REMOVAL PROJECT

FINAL INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

MARCH 2019

SCH # 2018121014



PREPARED FOR:



STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

PREPARED BY:



ecology and environment, inc.
Global Environmental Specialists

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Acronyms and Abbreviations

AB	Assembly Bill
AG	Agricultural-General
APLM	Avian Power Line Interaction Committee
APM	Applicant Proposed Measure
AR	Agricultural Residential
ATV	All-Terrain Vehicles
BCC	Birds of Conservation Concern
bgs	below ground surface
BLM	Bureau of Land Management
BMPs	Best Management Practices
BSA	Biological Survey Area
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalOSHA	California Occupational Health and Safety Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Standards Code
CCA	California Coastal Act
CCAA	California Clean Air Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	California Development Permit
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGF	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CNDDDB	California Natural Diversity Database
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources

CTR	Cultural Resources Technical Report
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DNL	day-night average sound level; also Ldn
DTSC	California Department of Toxic Substance Control
EDR	Environmental Data Resources, Inc.
EPA	United States Environmental Protection Agency
ESA	Environmentally Sensitive Areas
ESHA	Environmentally Sensitive Habitat Areas
ESO	Emergency Services Organization
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
G.O.	General Order
GHG	Greenhouse gas
GIS	Geographic Information System
GWP	Global Warming Potential
H ₂ S	Hydrogen Sulfide
HAP	Hazardous Air Pollutant
HCP	Habitat Conservation Program
HFC	Hydrofluorocarbon
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
IS/MND	Initial Study/Mitigated Negative Declaration
IWMA	Integrated Waste Management Act
KOP	Key Observation Point
kV	kilovolt
LCP	Local Coastal Program
Leq	Equivalent sound level
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MLDs	Most Likely Descendants
MM	Mitigation Measure
MMCRP	Mitigation Monitoring Compliance and Reporting Program
MMRP	Mitigation Monitoring and Reporting Plan
MRA	Multiple Resource Area
MRZ	Mineral Resource Zone
MSAs	Metropolitan Statistical Areas
MSCP	Multiple Species Conservation Program
MTCO _{2e}	Metric tons of Carbon Dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHS	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCTD	North County Transit District

NCTPP	Natural Community Tree and Plant Protection
NERC	North American Electric Reliability Corporation
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHTSA	National Highway Traffic and Safety Administration
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRCS	U.S. Department of Agriculture Natural Resources Conservation Service
O&M	Operations and Maintenance
O ₃	Ozone
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCB	Polychlorinated biphenyl
PEA	Proponent's Environmental Assessment
PFC	Perfluorocarbons
PGA	Peak Ground Acceleration
PM ₁₀	Particulate matter less than 10 microns in diameter
PM _{2.5}	Particulate matter less than 2.5 microns in diameter
PRC	Public Resources Code
PTC	Permit to Construct
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
RCRA	Resource Conservation and Recovery Act
ROW	Right-of-Way
RPO	Resource Protection Ordinance
RPS	Renewables Portfolio Standards
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association Of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas and Electric Company; also applicant
SF ₆	Sulfur hexafluoride
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
SO ₄	Sulfate
SR	State Route
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCR	Tribal Cultural Resource

TSP	Tubular steel pole
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WEAP	Worker Environmental Awareness Plan

PUBLIC UTILITIES COMMISSION
300 Capitol Mall
SACRAMENTO, CALIFORNIA 95814



Mitigated Negative Declaration

San Diego Gas & Electric Company TL674A Reconfiguration and TL666D Removal Project Application No. 17-06-029

Lead Agency: California Public Utilities Commission
Energy Division, Infrastructure Permitting and CEQA Section
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1.0 Mitigated Negative Declaration

1.1 Project Information

Project: TL674A Reconfiguration and TL666D Removal Project
City of Del Mar and City of San Diego, California

Proponent: San Diego Gas & Electric Company
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San Diego, CA 92123

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1.2 Background and Description of Project

Pursuant to the California Public Utilities Commission's (CPUC) General Order 131-D, San Diego Gas & Electric Company (SDG&E, or the applicant) has filed an application (A.17-06-029) with the CPUC for a Permit to Construct the TL674A Reconfiguration and TL666D Removal Project (hereafter "proposed project"). The application was filed on June 28, 2017, and includes the Proponent's Environmental Assessment (PEA) prepared by SDG&E pursuant to the CPUC's Rules of Practice and Procedure Rule 2.4 (CEQA Compliance).

The proposed project would consist of the following four components:

TL674A Reconfiguration: Proposes the ~~Entails~~ removal of an approximate 700-foot-long overhead 69-kilovolt (kV) ~~tap conductor~~, and installation of approximately 1.1 miles of new underground duct bank and four vaults to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation.

TL666D Removal: Includes removal of approximately 6 miles of overhead 69-kV ~~power tie~~ line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza Drive.

C510 Conversion: Comprises the conversion of approximately 3,900 feet of existing overhead 12-kV distribution line to an underground configuration within San Dieguito and Racetrack View Drive, removal of five distribution line poles adjacent to Racetrack View Drive, and installation of several poles connecting existing overhead to new underground configuration.

C738 Conversion: Proposes the ~~Entails~~ conversion of approximately 630 feet of existing overhead 12-kV distribution line to an underground configuration within the Sorrento Valley multi-use path, with removal of distribution line poles and installation of several new poles and risers.

The project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity of TL6973¹.

The proposed project would be located primarily within the northern portion of the city of San Diego along the Interstate 5 (I-5) corridor from Via de la Valle southward to where the power line crosses I-5 in the vicinity of the Sorrento Valley and Torrey Hills communities. A portion of the proposed project would be located in the city of Del Mar within the 22nd District Agricultural Association and within and adjacent to the San Dieguito Lagoon. The proposed project would be located entirely within the Coastal Zone and partially within the Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension.

SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito and Los Peñasquitos lagoons. According to the applicant, undergrounding the distribution line would increase the safety and overall reliability of the transmission system. Construction would be phased and could begin as early as year 2019, depending on CPUC approval. In accordance with the CPUC's General Order 131-D, the CPUC may not consider approving "any new electric generating plant or the modification, alteration or addition of electric transmission/power/distribution line facilities... [such as the proposed project] without first complying with the provisions of this order, [including] with the California Environmental Quality Act (CEQA)."

¹ Ampacity is defined as the maximum amount of current that an electrical conductor can safely carry.

1 The CPUC has prepared this Initial Study (IS) pursuant to CEQA for the proposed project to determine if
2 any significant adverse effects on the environment would result from project implementation. The IS uses
3 the significance criteria outlined in Appendix G of the CEQA Guidelines. If the IS for the proposed
4 project indicates that a significant adverse impact that could not be mitigated to a less than significant
5 level could occur, the CPUC would be required to prepare an Environmental Impact Report.

6
7 According to Article 6 (Negative Declaration Process) and Section 15070 (Decision to Prepare a Negative
8 Declaration or Mitigated Negative Declaration) of the CEQA Guidelines, a public agency shall prepare or
9 have prepared a proposed Negative Declaration or Mitigated Negative Declaration (MND) for a project
10 subject to CEQA when:

11
12 *(a) The initial study shows that there is no substantial evidence, in light of the whole record before*
13 *the agency, that the project may have a significant effect on the environment, or*

14 *(b) The initial study identifies potentially significant effects, but:*

15 *(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a*
16 *proposed mitigated negative declaration and initial study are released for public review*
17 *would avoid or mitigate the effects to a point where clearly no significant effects would*
18 *occur, and*

19 *(2) There is no substantial evidence, in light of the whole record before the agency, that the*
20 *project as revised may have a significant effect on the environment.*

21
22 Based on the analysis in the IS, the CPUC has determined that all environmental impacts related to the
23 proposed project would be less than significant or reduced to less-than-significant levels with
24 incorporation of feasible mitigation measures identified in the topical analyses. Mitigation measures
25 identified in this MND have been developed to avoid impacts altogether by avoiding certain actions or
26 parts of actions; limiting the degree or magnitude of particular action(s), including effects associated with
27 their implementation; rectifying effect(s) through repair, rehabilitation, or restoration of the impacted
28 environment; or reducing or eliminating impacts over time by preservation and maintenance
29 operations.... (Section 15370). The IS differentiates measures that have been incorporated into the
30 proposed project as specific design features or as applicant-proposed measures (APMs) from those
31 (mitigation measures) identified as necessary to reduce or eliminate significant environmental impacts.
32

1.3 Required Approvals

Table 1-1 lists permits and approvals that SDG&E may be required to obtain for the proposed project.

Table 1-1 Potential Project Approvals

Permit/Approval	Agency	Requirement
Nationwide Permit	U.S. Army Corps of Engineers	Consultation to determine necessity for permit to conduct construction in or adjacent to Waters of the United States
Permit to Construct	California Public Utilities Commission	Environmental clearance under CEQA
Coastal Development Permit	California Coastal Commission ⁽¹⁾	For construction, operation and maintenance within the coastal zone.
Right-of-Entry Permit	California State Parks	For construction, operation and maintenance within state park land.
Encroachment Permit	California Dept. of Transportation	For construction, operation and maintenance within, under, or over a state right-of-way.
<u>Archaeological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Archaeological Investigation/Collections on State Parks land</u>
<u>Paleontological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Paleontological Investigation/Collections on State Parks land</u>
General Construction Storm Water Permit	State Water Resources Control Board	For stormwater discharges during construction.
Encroachment Permit Traffic Control Permit	City of San Diego	For construction, operation and maintenance within, under, or over City of San Diego rights-of way
Access Permit	City of Del Mar	For construction, operation and maintenance within, under, or over City of Del Mar rights-of way

Note:

(1) The California Coastal Commission extends its approval authority to local agencies that have adopted a Coastal Development Plan.

1.4 Environmental Determination

Pursuant to the Public Resource Code and CEQA Guidelines, the lead agency, the CPUC, has prepared an IS for the proposed project to evaluate the proposed project's potential effects on the environment and to evaluate the level of significance of these effects. The IS relies on information in SDG&E's PEA filed on June 28, 2017; SDG&E's responses to data requests; project site reconnaissance by the CPUC environmental team in February 2018; the CPUC's independent analysis; and other environmental analyses.

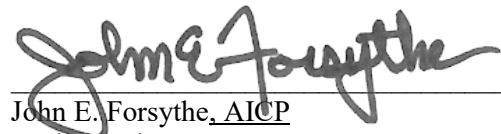
On December 6, 2018, the CPUC circulated the Draft IS/MND for the TL674A Reconfiguration and TL666D Removal Project for public review in compliance with CEQA and CPUC Rule 17.1. The Draft IS/MND was also filed with the State Clearinghouse on December 6, 2018, initiating a 30-day public review period. Written comments from two public agencies, one tribal organization, the applicant, and four residents were received during the public review period. Following closure of the public review period on January 7, 2019, the CPUC prepared responses to comments received, and the IS/MND was revised, as appropriate to reflect these comments. The comments and associated responses are presented in Chapter 7.0 of this document. Additional revisions made to the IS/MND are presented in Chapter 8.0.

1 Based on the IS, it has been determined that the proposed project would not have a significant effect on
2 the environment with the incorporation of the proposed APMs and mitigation measures. The IS/MND is
3 available for review at the offices of the CPUC, 300 Capitol Mall, Sacramento, California 95814, 505
4 Van Ness Avenue, San Francisco, California 94102; at the following public libraries within the:
5

San Diego County Library
Del Mar Branch
1309 Camino Del Mar
Del Mar, CA 92014

San Diego Central Library
MS-17 Gov. Documents
330 Park Blvd
San Diego, CA 92101

6
7 as well as digitally from the CPUC at <http://www.cpuc.ca.gov/environment/info/ene/delmar/delmar.html>.
8
9

10
11 
12 _____

John E. Forsythe, AICP
Senior Project Manager

Energy Division, California Public Utilities Commission

3-21-19

Date

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1.5 Applicant Proposed Measures and Mitigation Measures

SDG&E's PEA identifies APMs to address potentially significant impacts; these APMs are considered to be part of the description of the proposed project and are listed in Table 4-9 of ~~Section~~ Chapter 4.0, "Project Description," in the IS. Based on the IS analysis, additional mitigation measures are identified for adoption to ensure that impacts of the proposed project would be less than significant. The additional mitigation measures supplement or supersede the APMs and the project applicant, SDG&E, agrees to implement all of the additional measures identified as mitigation as part of the proposed project.

~~Section~~ Chapter 6, "Mitigation Monitoring and Reporting Plan (MMRP)" is included in the IS to ensure that the APMs and mitigation measures presented below are properly implemented. The MMRP describes specific actions required to implement each APM and mitigation measure, including information on the timing of implementation and monitoring requirements. Following project approval, the CPUC would prepare and implement a Mitigation Monitoring Compliance and Reporting Program (MMCRP) to ensure compliance with the mitigation measures approved in the Final IS/MND.

Implementation of the following mitigation measures would avoid potentially significant impacts identified in the IS or reduce them to less-than-significant levels.

Biological Resources

MM GEN-1: Implementation of All APMs. The applicant shall implement all APMs as stated in this environmental document, except in cases where specific APMs were superseded by mitigation measures. The APMs shall be incorporated into the Mitigation, Monitoring, and Reporting Plan.

MM BR-1: Preconstruction Surveys. Thirty days prior to the start of construction activities in new work areas that have the potential to impact biological resources (e.g., staging, vegetation clearing, trenching, helicopter activities, pole removal, stringing, stockpiling), a CPUC-approved biologist shall conduct preconstruction surveys for sensitive biological resources within all qualifying work areas, including access roads, footpaths, fly yards, stringing sites, pole removal sites, etc. In efforts to minimize the extent of human activities within San Dieguito Lagoon and Los Peñasquitos Lagoon while maintaining worker safety, preconstruction surveys in the lagoon areas will be conducted from a safe distance that still allows for adequate biological observation (via binoculars or other means). Lagoon areas that are accessible by foot shall undergo standard preconstruction surveys. If construction activities halt within a work area for fourteen days, the biological monitor shall recheck the work area for any sensitive biological resources prior to the re-commencement of construction activities. Avian surveys shall be conducted in accordance with SDG&E's Subregional NCCP as well as all other applicable requirements, as described in MM BR-6: Nesting Bird Management Plan. Prior to the start of daily project-related activities within all work areas, all areas with habitat suitable to support special status plants and wildlife, and all areas and places in which wildlife could become trapped (trenches, holes, excluded areas, etc.) shall undergo a daily biological clearance sweep, to be conducted by a qualified, CPUC-approved biological monitor. Only after verbal clearance by the biological monitor may project-related activities commence within work areas.

MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas (ESHAs, Jurisdictional Features), and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed

prior to the start of construction activities. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features.

To minimize the potential for human-related impacts in sensitive areas, fencing, flagging, or signage shall not be required in helicopter access-only work areas within San Dieguito Lagoon or Los Peñasquitos Lagoon. However, as described in MM BR-4, a CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. In work areas located outside of the lagoons or within the lagoons by fully accessible by foot, in which construction activities are anticipated to last less than one day, fencing and flagging installation will not be required, but a CPUC-approved biological monitor must be present to observe construction activities per MM BR-4. Equipment such as PVC conduit, which could potentially entrap wildlife, shall be inspected by a qualified, CPUC-approved biological monitor prior to use. Areas that would be subject to excavation (e.g., trenches and holes), shall be excluded and fully covered at the end of each day to prevent wildlife from falling in and becoming entrapped. If a trench or hole cannot be fully covered at the end of the day for any reason, the applicant shall install wildlife escape ramps at least every 100 feet, which shall have slopes no greater than 2:1.

Environmentally Sensitive Areas (areas with substantial biological resources such as special status species, sensitive natural communities, occupied and/or suitable habitat, or aquatic features), including Environmentally Sensitive Habitat Areas (ESHAs) and potentially jurisdictional aquatic features (under USACE, CDFW, RWQCB, and/or CCC jurisdiction), shall be clearly flagged, fenced, and/or indicated by signage to prevent inadvertent disturbance or trampling. Adequate buffer distances surrounding Environmentally Sensitive Areas shall be determined by the CPUC-approved biological monitor, based on the biological sensitivity of the resource and the nature of the approved project-related activities occurring nearby. Buffers between staging areas, stringing sites, and both ESHAs and wetland areas shall be no less than 50 feet, unless it is determined by the onsite, CPUC-approved biologist that a lesser buffer distance is appropriate. Buffer distance reduction requests must be directed to the CPUC, and should involve consultation with relevant agencies (USFWS, USACE, CDFW, and/or CCC) as needed.

MM BR-3: Worker Training Program. The applicant shall develop a Worker Environmental Awareness Program (WEAP), to be submitted to the CPUC for review and approval, that shall be administered to all project-related staff who will conduct on-site work (e.g., construction crews, management, monitors, contractors, sub-contractors, etc.). The applicant shall submit to the CPUC monthly documentation of who has undergone WEAP training. The WEAP shall describe the sensitive biological resources (plants, wildlife, and sensitive natural communities) that crews may encounter onsite, mitigation measures that shall be used to reduce impacts to these resources, the penalties associated with violations of the conditions of the IS/MND, acquired permits, and SDG&E's best management practices (BMPs). Additionally, the applicant shall develop an informational handout or booklet for each employee that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.

MM BR-4: Construction Monitoring. The applicant shall ensure that a qualified, CPUC-approved biological monitor is present at all times to monitor ground-disturbing activities (e.g., grading,

vegetation removal, trenching, digging, etc.) in areas that have the potential to support special status species. All ground-disturbing activities that would occur within 50 feet of Environmentally Sensitive Areas (areas supporting special status species, sensitive natural communities, and aquatic features), ESHAs, and all potentially jurisdictional aquatic features (non-wetland waters of the state, wetlands, streambeds, open water, tidal waters, and jurisdictional natural communities) will be monitored. To minimize the potential for human-related impacts in sensitive areas and to maintain worker safety, a biological monitor shall not be present to observe project activities within helicopter access-only work areas in San Dieguito Lagoon or Los Peñasquitos Lagoon. The CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. When the CPUC-approved biological monitor must observe project activities from a safe distance, the monitor will maintain communication with pole removal technicians, both before and after each workday, to ensure that appropriate biological resource protection protocols are implemented. In work areas located outside of the lagoons, including upland habitat within Torrey Pines State Natural Reserve Extension, and in work areas ~~or~~ within the lagoons ~~by~~ but fully accessible by foot, the CPUC-approved biological monitor shall be present to observe project activities as described above. Areas within existing pavement that do not have the potential to support special status species will receive a pre-construction survey and spot-checks, as determined by the biological monitor in accordance with SDG&E's NCCP. The biological monitor shall have temporary stop-work authority if he or she determines that project-related activities present a threat to sensitive biological resources. If the biological monitor must stop work due to threat to a biological resource, work may resume once the biological monitor determines that activities will no longer risk or endanger the resource, or upon further consultation with the appropriate agencies (CDFW, USFWS, USACE, RWQCB, or CCC).

MM BR-5: Natural Communities; Plant Protection Plan; Tree Protection and Preservation Plan. Natural Communities, Protected Tree, and Plant Protection Plan. To minimize project-related impacts to natural communities, protected trees, and special status plants, SDG&E shall adhere to the enhancement and restoration components of the ~~NCTPP~~ Plan, including the Quality Assurance restoration protocols described in Chapter 7.2 Habitat Enhancement Measures. Additionally, prior to construction, the applicant shall ensure that special status plant surveys are conducted during appropriate phenological (blooming) periods within one year prior to the start of construction to ensure detection. If detected, special status plants shall be flagged for avoidance. All reasonably accessible Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*) observed ~~within 50 feet of~~ directly adjacent to, ~~or within,~~ or proximal to proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction. This measure applies to Del Mar manzanita plants that could be inadvertently accessed and impacted by project activities, and does not apply to Del Mar manzanita plants that are difficult to access and that would be unlikely to be reached by construction crews or equipment. Additionally, no fewer than ~~fourteen~~ 30 days prior to the start of construction, the applicant shall develop and submit to the Plan to the CPUC, which shall include, at a minimum, the following:

- A Restoration Strategy, including a long-term monitoring strategy, for each protected tree species and special status plant species that is known to occur within or near (within 50 feet) proposed work areas, and that therefore could be impacted by proposed project activities. If a single restoration strategy and/or long-term monitoring strategy would be effective for multiple species or for groups of species, the discussion may be inclusive of all applicable species, as appropriate long-term monitoring strategies should ensure successful restoration and recolonization by the intended species.

- Restoration and long-term monitoring plans for natural communities including aquatic features and ESHAs that may experience project-related impacts.
- A Noxious and Invasive Weed Control Strategy to prevent the colonization of noxious and invasive weeds in areas disturbed by proposed project activities. The strategy shall include a procedure for washing, inspecting, documenting, and approving vehicles and equipment prior to being staged anywhere within the project area.
- Methods of communication between the applicant, the CPUC, and local qualified city arborists to discuss which protected trees, if any, may require trimming before or during project construction, and which protected trees may be subjected to construction activities within 20 feet of the Dripline Area.

Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP Plan shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, protected trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet) of a work area, SDG&E must avoid the resource, and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP Plan within ~~fourteen~~ 30 days of initial observation, for review and approval.

MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections. Additionally, the applicant shall not conduct project-related activities within at least 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), or Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31). A CPUC-approved avian biologist who is knowledgeable about avian species native to the coastal San Diego region shall conduct special status avian surveys where construction would occur during nesting bird season. The avian biologist shall conduct focused avian preconstruction surveys no more than fourteen days before project activities begin in each workspace, in areas containing or adjacent to suitable habitat for special status avian species. For project areas within 500 feet of or within suitable habitat for Western Snowy Plover (*Charadrius alexandrinus nivosus*), the surveying avian biologist must have documented experience surveying Western Snowy Plover. Surveys shall be conducted within work areas plus a buffer large enough to encompass the ~~next~~ nest buffer of any special status avian species for which suitable habitat is present (i.e., 100 to 500 feet). In work areas that contain no suitable or potentially suitable habitat for special status avian species, and that would not be subject to any ground disturbance or vegetation trimming/removal, focused avian preconstruction surveys are not necessary.

If nesting birds are observed ~~within 500 feet of work areas within or adjacent to the lagoons, Torrey Pines State Natural Reserve Extension, ESHAs, or other proposed work areas~~ during focused avian surveys or general preconstruction surveys (see MM BR-1), the avian biologist shall establish appropriate, species-specific vertical and horizontal buffers between project activities and established nests and territories. The buffers shall be no less than 500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plover nests (unless otherwise approved by USFWS and/or CDFW). Buffers between project activities and other avian nests shall be established on a species-specific basis, based on USFWS and CDFW recommendations and avian biologist observations, the following distances for each species:

- 1 ~~• 500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western~~
- 2 ~~Snowy Plovers;~~
- 3 ~~• 300 feet (vertical and horizontal) for all other special status avian species (passerine, waders,~~
- 4 ~~etc.); and~~
- 5 ~~• 100 feet (vertical or horizontal) from nests of non-special status avian species.~~

6 If non-nesting special-status avian species are observed, project activities may resume at distances
7 greater than 100 feet from San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural
8 Reserve), and Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to
9 August 31), but a CPUC-approved biological monitor must be present. If project activities would
10 occur between 100 and 500 feet of occupied (non-nesting) Western Snowy Plover habitat, then an
11 avian biologist with documented experience surveying Western Snowy Plover must be present to
12 observe all project activities.

13 ~~The nest buffer distances described above~~ Nest buffer distances may be reduced on a case-by-case
14 basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest
15 sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be
16 established and defined in the Nesting Bird Management Plan where applicable, between helicopter
17 activities and active bird nests. The applicant shall notify the CPUC, USFWS, and CDFW of nest
18 buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for
19 nest-buffer reductions to special status species and raptor nests and will provide verification to the
20 CPUC of this coordination when reducing such buffers. Nest buffer reductions for common, non-
21 special status species shall be reduced as established by protocols established in the Nesting Bird
22 Management Plan (NMBP). Requests to decrease buffer distances must be submitted to the CPUC for
23 review and approval prior to implementation. Buffer distances may not be reduced to less than 100
24 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during
25 construction activities until the young have fledged, the nest becomes inactive, or until construction
26 activities have concluded within the buffer area.

27 The applicant shall develop an ~~Nesting Bird Management Plan (NBMP)~~ in accordance with the
28 Avian Power Line Interaction Committee (APLIC) and USFWS guidelines (APLIC and USFWS
29 2005), to be submitted to the CPUC no fewer than 30 days prior to the start of construction. The plan
30 shall contain, at a minimum, the following information and strategies intended to minimize impacts to
31 avian species:

- 32 • Methods from APLIC Reducing Avian Collisions with Power Lines: The State of the Art in 2012
33 (APLIC 2012) that would minimize the risk of avian collisions, injuries, and electrocutions
34 associated with new poles and aboveground utility features, including those associated with the
35 C738 and C510 conversions;
- 36 • Species-specific USFWS and/or CDFW survey protocols and planned compliance procedures
37 with the protocol(s);
- 38 • Survey timing, methods, and boundaries, protocols for determining whether a nest is active and
39 how to protect active nests, documentation and reporting methods for observed active nests, and
40 surveyor qualifications;
- 41 • Nest documentation (nest activity, active/inactive, etc.) and an established procedure for
42 contacting the appropriate agencies (CPUC, CDFW, USFWS) with inactive nest removal requests
43 for review;

- Nesting bird deterrent methods for activities to be conducted outside of the lagoons and Torrey Pines State Natural Reserve, but within nesting bird season;
- Species-specific buffer determinations relating to project components and protocols for requesting a reduced buffer distance from the CPUC and from the wildlife agencies; and
- Language indicating that buffer distances shall be based on biological data and site/species-specific observations, not generalized assumptions.

MM BR-7: Nighttime Lighting Protection. Any lighting required for construction activities, including activities that would occur at staging areas/fly yards, stringing sites, drop zones, and other work areas, shall be minimized to the extent feasible, and shall utilize the lowest illumination necessary for worker safety, in accordance with Occupational Health and Safety Administration standards. Lighting shall be selectively placed, oriented downward, and shielded to minimize offsite light spill. Nighttime lighting in wildlife corridor areas shall be of low-sodium or similar lighting methods, in accordance with the City of San Diego MHPA requirements. Construction equipment and vehicle speeds on unpaved roads during nighttime activities shall be restricted to 15 miles per hour as described in SDG&E's NCCP, and biologists shall conduct vehicle checks for trapped or concealed wildlife prior to moving equipment after dark to minimize strike and collision risk to nocturnal wildlife species. Lights shall not be left on during nighttime hours, except as required for nighttime work and/or an emergency.

MM BR-8: Butterfly Protection. Any tree trimming that would occur during western monarch butterfly overwintering season (September-February) shall be observed by a CPUC-approved biological monitor who is knowledgeable about western monarch butterfly ecology and life history. The monitor shall inspect the tree to determine the presence of overwintering western monarch butterfly, or to determine if the tree has a high potential to support overwintering western monarch butterfly populations, based on tree species and historic overwintering western monarch butterfly occurrences (see Table 5.4-10). Trees may only be trimmed or removed if the biologist determines that they do not support overwintering western monarch butterfly populations. No Torrey pines or eucalyptus trees may be trimmed within San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve Extension, or the locations identified in Table 5.4-10 during overwintering season.

To minimize the potential for impacts to wandering skipper, a Narrow Endemic Species, and in accordance with SDG&E's NCCP, the applicant shall not conduct construction activities within San Dieguito Lagoon or Los Peñasquitos Lagoon during peak flight season (July-September). If construction activities within any work areas (within or outside of lagoon areas) would result in the removal of or damage to the wandering skipper host plant (salt grass) or to native nectar sources known to support western monarch butterfly, the applicant shall restore the nectar sources at a 1:1 ratio, restoring salt grass directly, and restoring monarch butterfly nectar sources either directly, or as described by the California Coast recommendations (Xerces 2016b). Only native milkweed species may be used for restoration.

~~**APM-BIO-09:** Prior to construction, a habitat survey for potential bat roosts that may be impacted by construction activities will be conducted. During the survey, potential roost sites will be searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. Up to two weeks prior to construction, a qualified biologist will conduct bat surveys at roost sites identified as potentially active from signs of bat use identified during the survey. If bats are detected, SDG&E will avoid conducting construction activities that may directly impact the active roost site. If~~

an active maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31).

Cultural Resources

MM CUL-1: Archeological Site Buffer. Buffers shall be established around each of the significant, known archaeological sites in areas where ground disturbance is anticipated, and the sites will be noted as “environmentally sensitive areas” to preserve confidential locational information as required by law. Information relating to the exact location of these sites shall be considered confidential and shall not be made publicly available to prevent unauthorized discovery and disturbance of archeological resources in conformance with state law.

The buffer may consist of radial silt fencing or other means of identifying the area in which construction or ground disturbance must be avoided. Mapping and other discoverable publications shall redact citations to the specific locations of these resources.

MM CUL-2: Cultural Resources Monitoring. The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project’s qualified archaeological monitor.

A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project via a Cultural Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days prior to the start of project activities. The Cultural Resources Monitoring Plan shall include, at minimum, information regarding the location of project work areas/sites requiring cultural resources monitoring, how monitoring will be conducted, and the respective roles and responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified archaeologist. Responsibilities for the CPUC-approved archaeological archaeological monitor shall include cultural resources monitoring and implementing stop-work authority in the event of an unanticipated cultural resources discovery during project activities. Responsibilities of the SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to recommence project activities after a stop-work order has been issued to protect potential cultural resources, analysis and curation of materials, and preparation of a report detailing the results of monitoring activities results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.

Where cultural resources monitoring is needed at project work areas/sites within California State Parks lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.

MM CUL-3: Cultural Resource Training. Prior to construction, all SDG&E, contractor, and subcontractor personnel associated with the proposed project shall receive training in the appropriate work practices necessary to effectively identify and implement treatment of cultural resources and to

1 comply with the applicable environmental laws and regulations, including those related to
2 recognizing possible buried resources and maintaining the confidentiality of resources at in-situ
3 locations. This training shall include how to identify cultural resources (e.g., the types of resources to
4 look for) and what procedures are to be followed upon the discovery or suspected discovery of
5 archaeological materials, including Native American remains, as well as paleontological resources.

6 **MM CUL-4: Cultural Resource Discovery.** In the event that cultural resources are discovered
7 during construction, the applicant's archaeologist and Environmental Project Manager shall be
8 contacted upon the time of discovery. The field resource specialist shall evaluate the significance of
9 discovered resources using CRHR and NRHP criteria and accepted practices. The CPUC must concur
10 with the treatment of significant resources before construction activities in the vicinity of the
11 discovery shall be allowed to resume.

12 For significant cultural resources, a research design and, if needed, a data recovery program would be
13 prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned,
14 cataloged, and permanently curated at an appropriate institution or repatriated or redeposited in a
15 secure location onsite if curation is infeasible. All artifacts shall be analyzed to identify their function
16 and chronology as they relate to the prehistory or history of the area. Faunal material shall be
17 identified as to species.

18 **MM CUL-5: Paleontological Resource Monitoring and Discovery.** A qualified paleontologist
19 shall attend pre-construction meetings, when needed, to consult with the excavation contractor on
20 schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as
21 an individual with a master's or doctorate degree in paleontology or geology and who is experienced
22 with paleontological procedures and techniques; who is knowledgeable in the geology and
23 paleontology of San Diego County; and who has worked as a paleontological mitigation project
24 supervisor in the region for at least one year.

25 The requirements for paleontological monitoring shall also be noted in the Paleontological
26 Monitoring Plan to be prepared by the applicants and approved by the CPUC at minimum 30 days
27 prior to construction beginning. A paleontological monitor is defined as an individual who has
28 experience in the collection and salvage of fossil materials. The paleontological monitor shall work
29 under the direction of a qualified paleontologist and shall be on site to observe excavation operations
30 that involve the original cutting of previously undisturbed deposits with high paleontological resource
31 sensitivity (i.e., Torrey Sandstone Formation, old paralic deposits, and very old paralic deposits).

32 In the event that fossils are encountered, the paleontologist will have the authority to divert or
33 temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in
34 a timely fashion. The paleontologist shall contact the applicant's Cultural Resource Specialist and
35 Environmental Project Manager at the time of discovery. The paleontologist, in consultation with the
36 applicant's Cultural Resource Specialist, shall determine the significance of the discovered resources.
37 The applicant's Cultural Resource Specialist and Environmental Project Manager will need to concur
38 with the evaluation procedures to be performed before construction activities are allowed to
39 resume.

40 Small fossil remains may be present, and therefore a screen-washing operation may be set up onsite.
41 If fossils are discovered, the paleontologist (or paleontological monitor) will recover them, along with
42 pertinent stratigraphic data. The recovery of bulk sedimentary-matrix samples for offsite wet
43 screening from specific strata may be necessary, as determined in the field. Any fossil remains
44 collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at

a scientific institution with permanent paleontological collections. A final summary report will be completed that would outline the results of the recovery program. The report will discuss the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

MM CUL-6: Treatment of Human Remains. The applicant will follow current legal requirements at the time of discovery for the treatment of human remains. At present, pursuant to Section 5097.98 of the California PRC and Section 7050.5(e) of the California State Health and Safety Code Section and PRC Section 5097.98, if human remains or bone remains of unknown origin are found at any time during project-related construction activities, all work shall stop in the vicinity of the find, and the San Diego County Coroner shall be contacted immediately.

If the remains are determined to be Native American, the coroner shall notify the NAHC, who shall identify the person believed to be the MLD, who shall have at least 48 hours from notification of the find to comment. The landowner and MLD, with the assistance of the applicant and the archaeologist as requested, shall make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5(d)). If the MLD and the other parties do not agree on the reburial method, the requirements of PRC Section 5097.98(e) shall be implemented, which states that "...the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

Hazards and Hazardous Materials

MM HAZ-1: Hazardous Materials Waste Management Plan / Emergency Spill and Evacuation Training. Prior to construction, the applicant shall prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. The plan shall include the following requirements and procedures:

1. The Worker Training Program (see MM BR-3) would include training requirements for construction workers such as in appropriate work practices, including and spill prevention and response measures. Additional training for those performing excavation activities shall be required and shall include training on types of contamination and contaminants (e.g., petroleum hydrocarbons, asbestos, and hazardous materials as defined by the California HSC) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Training would also entail safe evacuation, which could be required due to an unanticipated major spill or other emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the affected work site and specified, approved evacuation route(s) in case of emergency. This training may be carried out as a stand-alone training module or in conjunction with the training required in MM BR-3.
2. Containment of all hazardous materials at work sites and properly dispose of all such materials.
 - a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather and further contamination.
 - b. Fuels and lubricants shall be stored only at designated staging areas.
3. Maintenance of hazardous material spill kits for small spills at all active work sites and staging areas. Thoroughly clean all spills as soon as they occur. If an accidental spill or fluid leak occurs

at any time during project construction, including in locations within 50 feet of aquatic resources in unanticipated circumstances such as equipment malfunction, secondary containment strategies may be utilized to contain the spill.

4. Storing sorbent and barrier materials at all construction staging areas, including staging areas used during activities for decommissioning. Sorbent and barrier materials will be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials.
5. Performing all routine equipment maintenance at a shop or at the staging area and recovering and disposing of wastes in an appropriate manner.
6. Monitoring and removal of vehicles used for construction-related activities with chronic or continuous leaks from use and complete repairs before returning them to operation.
7. Storing shovels and drums at the staging areas. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material. Only trained construction workers shall handle hazardous, and potentially hazardous, materials.
8. Transporting, shipping, and disposal procedures for hazardous waste.
9. Identification of a qualified field environmental representative for the proposed project for management of hazardous materials, hazardous wastes, contaminated soil, and contaminated groundwater.
10. Procedures for notifying applicant and agency personnel in the event of discovery of contaminated soil and/or groundwater. Contact information for federal, regional, and local agencies; the applicant's field environmental representative and environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers.

This plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.

Noise

MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction:

- **City of San Diego:** 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).
- **City of Del Mar:** 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays).

In the event that project scheduling necessitates work outside of the hours permitted under local noise ordinances, SDG&E would meet and confer with the local jurisdictions, as needed, for guidance on scheduling and managing such construction noise in compliance with Article 9.4: Noise Abatement and Control, of the City of San Diego Municipal Code.

MM NOI-2: Advance Notice of Construction. The applicant shall notify all sensitive receptors, including residences, within 50 feet of all project components at least 30 days prior to construction activities occurring in that area to provide opportunity to avoid the noise. The notice shall include dates, times, and description of construction activities. The applicant shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction.

MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance, whichever is higher. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:

- Temporarily and safely installing and maintaining absorptive noise control barriers ~~in the perimeter of construction sites and/or~~ between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.
- Limiting heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity.
- Ensuring that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition.
- Maintaining construction equipment according to manufacturer recommendations.
- Minimizing unnecessary construction equipment idling.
- Reducing noise from back-up alarms (i.e., alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimize the need for back-up alarms. Use flagmen to minimize the time needed to back up vehicles.
- When possible, using construction equipment specifically designed for low noise emissions, such as equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines.
- Where practical, locating stationary equipment such as compressors and generators away from sensitive receptors.

Recreation

MM REC-1: Documentation of Conditions. The applicant shall photograph pre-project conditions at the Torrey Pines and Del Mar Heights Fly Yards from multiple viewpoints to adequately represent pre-construction conditions at both sites. The applicant shall submit a portfolio of these images to CPUC staff and to appropriate representatives of Del Mar Heights Elementary School and Torrey Pines State Beach prior to the use of either facility for construction-related purposes.


Upon completion of project construction, the applicant shall restore the fly yard sites to pre-project conditions and submit a portfolio of "before and after" photographs documenting physical conditions of each site, as applicable. The portfolio of images shall be submitted to the CPUC and to designated

agents on behalf of Del Mar Heights School and Torrey Pines State Beach parking facility to ensure that the affected facilities are returned in satisfactory condition.

1.6 Findings

The IS was prepared to identify the potential effects on the environment from reconfiguration of TL674A and removal of TL666D distribution lines and to evaluate the significance of those effects. Based on the IS and Findings listed below, the lead agency (CPUC) has determined that the proposed project would not have a significant effect on the environment.

- With implementation of the above mitigation measures and APMs listed in Table 4-9, the proposed project would not significantly degrade the quality of the environment.
- With implementation of the above mitigation measures, both short-term and long-term environmental effects associated with the proposed project would be less than significant.
- When impacts associated with implementing the proposed project are considered cumulatively, the proposed project's contribution to project-related impacts are not considerable.
- Based on the IS, there is no evidence that implementing the proposed project would result in substantial, adverse environmental impacts.



John E. Forsythe, AICP
Senior Project Manager
Energy Division, California Public Utilities Commission

3-21-19

Date

2.0 Environmental Determination

2.1 Environmental Factors Potentially Affected

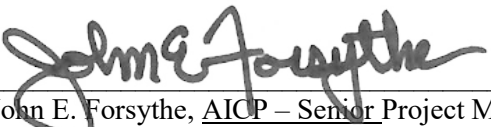
The environmental factors checked below would be potentially affected by the proposed project, involving at least one impact that is a "Potentially Significant Impact" and requiring implementation of mitigation as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources |
| <input type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input checked="" type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation and Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| | <input type="checkbox"/> Utilities and Service Systems | |

2.2 Environmental Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


John E. Forsythe, AICP – Senior Project Manager
Energy Division, California Public Utilities Commission

3-21-19
Date

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3.0 Introduction to the Initial Study

3.1 Proposed Project Overview

Pursuant to the California Public Utilities Commission's (CPUC) General Order 131-D, San Diego Gas & Electric Company (SDG&E), a regulated California utility, filed an application (A.17-06-029) with the CPUC on June 28, 2017, for a Permit to Construct the TL674A Reconfiguration and TL666D Removal Project (proposed project). The application includes the Proponent's Environmental Assessment prepared by SDG&E pursuant to the CPUC's Rules of Practice and Procedure Rule 2.4 (CEQA Compliance). The CPUC deemed the application complete on September 27, 2017.

The proposed project would consist of the following four components:

- | | |
|-------------------------|--|
| TL674A Reconfiguration: | Removal of approximately 700 feet of 69-kilovolt (kV) overhead tap; installation of about 1.1 miles of underground duct bank with four vaults to connect TL674A (renamed TL6973 as part of the project) to the Del Mar Substation. |
| TL666D Removal: | Removal of approximately 6 miles of 69-kV overhead power line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza Drive. |
| C510 Conversion: | Conversion of approximately 3,900 feet of existing 12-kV overhead distribution line to an underground configuration within San Dieguito and Racetrack View Drive; removal of five poles adjacent to Racetrack View Drive; and installation of several poles to connect existing overhead lines to new underground configuration. |
| C738 Conversion: | Conversion of approximately 630 feet of existing 12-kV overhead distribution line to an underground configuration within the Sorrento Valley multi-use path, with removal of distribution line poles and installation of several new poles and risers. |

The proposed project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity associated with TL6973.¹

The proposed project would address the safety, environmental quality, and reliability of the local area electrical network, allowing SDG&E to meet internal design standards as well as industry standards.

¹ Ampacity is defined as the maximum amount of current that an electrical conductor can safely carry.

3.2 Environmental Analysis

3.2.1 CEQA Lead Agency

The CPUC is the lead agency for review of the proposed project under CEQA because the CPUC is the agency that must decide whether to adopt the Mitigated Negative Declaration (MND) and to approve or deny the Permit to Construct.

3.2.2 Initial Study Purpose

This Initial Study (IS) has been prepared pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA Guidelines (14 California Code of Regulations 15000 et seq.) and the CPUC CEQA rules (Rule 2.4). As described in Section 15063 of the CEQA Guidelines, an IS serves as a preliminary investigative tool to identify potential environmental effects. It is recommended as the basis for determining whether to prepare an environmental impact report (EIR), which is supported by evidence in the record, all potentially significant impacts associated with proposed construction, operation and maintenance of the project can be mitigated to levels below significance; therefore, the CPUC may adopt an MND in accordance with Public Resources Code section 21080.

3.2.3 Initial Study Content

The CEQA Guidelines reflect the requirements set forth in Chapter 3, Title 14 of the Public Resources Code and provide objective criteria and procedures for the orderly evaluation of projects and the preparation of environmental impact reports, negative declarations and mitigated negative declarations by public agencies, such as the CPUC. The Guidelines address legislative directives and initiatives, reflect court decisions interpreting the CEQA statute and incorporate practical planning considerations in environmental analyses. The IS's analyses are based on information from SDG&E's Preliminary Environmental Assessment and associated submittals, a site visit, CPUC data requests, and additional research. The content and analysis in this IS is based on the ~~current~~ CEQA Guidelines Appendix G environmental checklist in force at the date of publication of the Draft IS/MND, which includes 89 questions contained in the ~~19~~ 20 topics presented below.

- Aesthetics
- Agricultural Resources
- Air Quality
- Greenhouse Gases
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Traffic and Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

3.2.4 CEQA Guidelines and Appendix G Environmental Checklist Update

In 2013, the Governor’s Office of Planning and Research (OPR) initiated a comprehensive, multi-year effort aimed at updating the CEQA Guidelines and Appendix G environmental checklist. The reasons supporting the update are multifold: lawmakers have recently adopted various legislation amending the CEQA statute and Guidelines, including major reforms pertaining to the metrics used in evaluating transportation impacts to the introduction of new environmental topics on the environmental checklist, such as tribal cultural resources resulting from recent legislation (AB 52). The California Supreme Court has also published several decisions that affect the CEQA practice Guidelines. The updated CEQA Guidelines were adopted on December 28, 2018, after publication and circulation of the Draft IS/MND for the proposed project.

The adopted amendments to the CEQA Guidelines fall into two categories: (1) those dealing with efficiency and organizational improvements, and (2) those that represent major substantive improvements. The emphasis of this review is to focus on those changes to the Guidelines that could represent new information or result in effects of substantially greater severity than those evaluated for the proposed project using the ~~current~~ previous version of the Appendix G environmental checklist. Potential efficiency improvements address: using regulatory standards in the CEQA process; determining whether a project is “within the scope” of a program EIR; clarifying how and when tiering rules apply; detailing how and when to use certain environmental exemptions; and amendments pertaining to remand and remedies for projects subject to injunction or other court action. The emphasis of this review ~~would be~~ is restricted to the changes to Appendix G, environmental checklist.

The amendments ~~would~~ eliminate some duplicative questions and some issues ~~would be~~ have been reorganized. For example, the previous Guidelines ~~currently~~ included two questions pertaining to whether a project would conflict with a habitat conservation plan and other related plans in two separate sections: biological resources and land use planning. OPR ~~proposes to delete~~ the question from the land use and planning section. The question in the biological resources section would remain unchanged. As ~~currently proposed~~ adopted, the amendments ~~would~~ relocate questions related to paleontological resources from cultural resources to geology as directed in Assembly Bill 52 (Gatto 2014). These changes would not materially affect the conclusions reached in this study relating to biological resources, cultural resources or land use (see Sections 5.4, “Biological Resources,” 5.5, “Cultural Resources,” and 5.10, “Land Use and Planning,” for more information).

With respect to population growth, the newly adopted Appendix G ~~currently~~ asks ~~whether a project would cause substantial population growth. This would be changed if the current amendments were adopted to ask~~ whether such growth would be *unplanned*. Planned growth may result in environmental effects, though these impacts are assumed to be analyzed in connection with a land use plan or regional plan accounting for that population growth. Unplanned growth is assumed to occur in an absence of plan or program that could cause significant effects on the environment. As described in Section 5.13, “Population and Housing,” of the IS, the proposed project would not induce growth or displace numbers of people or housing. The proposed project would involve utility reliability and maintenance activities. It would not generate population growth directly nor would it result in availability of surplus energy

resources that could indirectly induce population growth. No changes to the project's less-than-significant impacts would be warranted by the ~~adopting~~ amended Guidelines.

The Guidelines ~~propose~~ includes an amendment to Aesthetics by revising the question whether a project would "degrade the existing visual character of a site." Given the difficulty in often analyzing this potential impact objectively, OPR ~~proposes to revised~~ the criterion to ask whether the project is consistent with zoning or other regulations governing visual character. Because the proposed project is not subject to local zoning or any other similar local land use regulation, the ~~proposed~~ adopted checklist amendment would not apply to the project's analyses or the less-than-significant conclusions reached for the topic of aesthetics.

Major substantive improvements include guidance regarding how to analyze a project's energy usage and impacts. Previously located in Guidelines Appendix F and often limited to EIRs, the energy impact analysis ~~would~~ is now ~~be~~ included in Appendix G and require agencies to address energy consumption as part of all of their CEQA processes. The amended Checklist ~~would be amended to~~ includes the following questions: Would the project result in potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation, or, conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would involve electric utility line reconfiguration, removal, and maintenance. Most of the proposed project's energy consumption would occur during construction activities and primarily associated with fuel consumption from vehicle trips and construction equipment use. The proposed project would not involve consumption of other sources of energy, such as electricity or natural gas. As described in Section 5.7, "Greenhouse Gases," the proposed project would be required to comply with federal and state standards addressing fuel efficiency for light- and heavy-duty vehicles. Additionally, the increasingly stringent state and federal regulations on engine efficiency combined with local, state, and federal regulations limiting engine idling times from equipment would further reduce the amount of fuel demand during project construction. As shown in Section 5.7, the project would not conflict with relevant plans involving renewable energy and energy efficiency, such as the statewide Climate Change Scoping Plan, the San Diego Association of Government's 2014 Regional Energy Strategy, and the City of San Diego Climate Action Plan. Because the proposed project would avoid the wasteful and inefficient use of transportation fuel and would not conflict with state and local policies on renewable energy and energy efficiency, impacts to energy resources would be less than significant.

The Checklist adds new questions related to transportation and wildfire, pursuant to Senate Bill 743 (Steinberg 2013), and Senate Bill 1241 (Kehoe 2012), respectively, as well as water demand. Amended ~~Proposed~~ Guidelines Section 15064.3, "Determining the Significance of Transportation Impacts" addresses the use of Level of Service as a metric for determining the significance of transportation impacts under CEQA and phases that out by the year 2020. After that time, agencies would use a "vehicle miles traveled" (VMT) metric to evaluate transportation effects. This metric better aligns with tracking other statewide environmental goals, such as reducing greenhouse gases. Projects that reduce VMT will be presumed to have a less than significant impact. This section also discusses the modeling that may be used to analyze VMT. As discussed in Section 5.16, "Transportation and Traffic," the analysis conducted

for this project anticipated this regulatory changed and addressed it appropriately. The implementation of VMT as the metric for determining the significance of transportation impacts would not affect the analysis or conclusions reached for the project's transportation impacts evaluated in Section 5.16 in this IS/MND.

The updated Appendix G also includes the analysis of potential wildfire risks. The amended Checklist includes the following questions, to be considered for projects that are 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?;
- 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?
- 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?; or
- 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?

A brief discussion of wildfire hazards within and surrounding the proposed project area, as well as an analysis of potential wildfire risks associated with implementation of the proposed project, is included in Section 5.8, "Hazards and Hazardous Materials". As displayed on Figure 5.8-2, the majority of the proposed project area falls within a "Very High" Fire Hazard Severity Zone. While construction activities in general present a slightly elevated fire risk associated with the use of combustion engines which could feasibly produce a spark, such risks would be substantially minimized through required implementation of the applicant's existing *Operations and Maintenance Wildland Fire Prevention Plan*.

If overhead electrical utility infrastructure malfunctions and sparks, wildfires can result, especially in wildfire-susceptible regions such as the proposed project area (Russell, Benner, and Wischkaemper 2012). Upon project completion, existing overhead electric utility infrastructure would be removed from vegetated areas throughout the surrounding "Very High" Fire Hazard Severity Zone. Utility lines that would be reconfigured as part of the proposed project would be installed in an underground orientation within existing paved roadways during the proposed project operational phase. Therefore, removal of the overhead electric utility infrastructure drastically reduces the risk of utility line-caused wildfires within the proposed project area, and wildfire-related impacts associated with proposed project implementation would be less than significant.

~~Proposed~~ Newly adopted Guidelines Section 15155(f) ~~would~~ require agencies to consider the degree of certainty that exists regarding project water supplies throughout the life of the project. Agencies must also evaluate the pros and cons of a project based on water demand. If an agency cannot determine that water will be available for the life of the project, potential alternative water supplies and their respective environmental impacts must be evaluated. The project's water demands relate primarily to water needed for fugitive dust suppression. The applicant provided a detailed breakdown of the assumptions

undergirding the up to 707,000 gallons of water that could be required for purposes of suppressing dust on unpaved roads and in and around work areas. The ~~proposed~~-adopted amendment would be satisfied with the water demand estimates that have been disclosed in Section 5.18, “Utilities and Service Systems.”

3.2.5 Revisions to the Draft IS/MND and Why Recirculation Is Not Required

On February 5, 2019, the applicant submitted to the CPUC an email request to include supplemental information related to removal and replacement of a circuit breaker within the existing Del Mar Substation. According to the applicant, this work may be required in order to accommodate increased ampacity associated with the new TL6973 segment that would be established as part of the proposed project. Details related to the potential circuit breaker removal and replacement work are included as text revisions to the Draft IS/MND in Chapter 4.0, “Project Description,” Sections 4.5.2 and 4.6. Text revisions have also been incorporated in the relevant environmental analyses (see specifically Sections 5.3, “Air Quality”; 5.6, “Geology and Soils”; 5.7, “Greenhouse Gases”; 5.8, “Hazards and Hazardous Materials”; 5.12, “Noise”; 5.16, “Transportation and Traffic”; and 5.19, “Mandatory Findings of Significance”) to sufficiently cover any potential environmental effects associated with the circuit breaker removal and replacement work as a component of the overall project evaluated in this IS.

Section 15073.5 of the State CEQA Guidelines requires recirculation of a Negative Declaration when the document must be “substantially revised” after public notice of its availability has previously been given pursuant to Guidelines Section 15072, but prior to its adoption. A “substantial revision” as defined in Guidelines Sections 15073.5(b) entails:

- (1) [identification of] a new, avoidable significant effect and mitigation measures or project revisions [that] must be added [to the Negative Declaration] in order to reduce the effect to insignificance;
- or
- (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant levels and new measures or revisions must be required.

Recirculation is not required pursuant to CEQA Guidelines Section 15073(c) under the following circumstances: (1) mitigation measures are replaced with equal or more effective mitigation measures; (2) new project revisions are added in response to written or verbal comments on the project’s effects identified in the proposed negative declaration, that are not new or avoidable significant effects; (3) measures or conditions of approval are added after the circulation of the negative declaration that are not required by CEQA, that do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect; and (4) new information is added to the negative declaration that merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The current revisions and clarifications to the proposed project do not amount to “substantial revisions” because no new avoidable effect has been identified resulting from the circuit breaker removal and replacement work described by the applicant. The potential activities at the Del Mar Substation would not result in any new significant impacts in the Draft IS/MND, nor would these changes increase the severity

of any of the project's less-than-significant impacts identified in the Draft IS/MND. Mitigation measures identified in this Final IS/MND would continue to be required in order to reduce or avoid the less-than-significant environmental impacts of the project, and the additional work incorporated through revisions to this Final IS/MND would not eliminate the need to implement any of the mitigation measures identified in the Draft IS/MND or necessitate any substantial revisions. Finally, no new or modified measures would be required in order to mitigate environmental impacts that may be associated with the circuit breaker removal and replacement at the Del Mar Substation because no significant impacts or impacts of greater severity would occur if this additional project component were implemented as described in text revisions in Chapters 4.0, "Project Description" and 5.0, "Environmental Setting and Impacts."

3.2.5 3.2.6 Initial Study Organization

The IS has been organized into the following sections:

- **Chapter 3.0: Introduction.** Provides an introduction and overview of the proposed project and the CEQA process, and identifies key areas of environmental analysis.
- **Chapter 4.0: Project Description.** Presents the project objectives and provides an in-depth description of the proposed project, including construction details and methods.
- **Chapter 5.0: Environmental Setting and Impacts.** Includes a description of the existing conditions and the analysis of the proposed project's potential environmental impacts, and identifies mitigation measures to reduce potentially significant impacts to less-than-significant levels.
- **Chapter 6.0: Mitigation Monitoring and Reporting Plan.** Identifies the monitoring requirements for applicant proposed measures, mitigation measures that SDG&E must implement as part of the proposed project, actions required in order to implement these measures, as well as monitoring requirements and the timing of implementation for each measure.
- **Chapter 7.0: Responses to Comments.** Includes responses to comment letters received during the Draft IS/MND public review period.
- **Chapter 8.0: Other Revisions to IS/MND.** Includes revisions identified as needed to clarify the Draft IS/MND.
- **Chapter 9.0: List of Preparers.** Includes the list of professionals involved during preparation of the IS/MND.
- **Appendices:** Includes revised air quality and greenhouse gas emissions estimated from the California Emissions Estimator Model (CalEEMod), including tabulation of helicopter emissions; biological survey reports; revised master table of special status species occurrence potentials; cultural resources documentation; database search records of hazardous materials sites; land use policy matrix; tribal consultation correspondence; paleontological technical study; and detailed project components maps, and correspondence with the California Department of Parks and Recreation.

References

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4.0 Project Description

TL674A Reconfiguration and TL666D Removal Project

San Diego Gas & Electric Company Application No. 17-06-029

San Diego Gas & Electric Company (SDG&E) is a regulated public utility that provides electric and natural gas service to approximately 3.4 million consumers within an approximately 4,100-square-mile service area, covering 25 cities and unincorporated areas within San Diego County and southern Orange County.

The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), ~~reconductoring~~ reconfiguring of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. Connecting TL674A/6973 to the Del Mar Substation could increase ampacity¹ through and may necessitate possible removal and replacement of an existing circuit breaker located within the substation. The proposed project would also include the conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and ~~C630~~ C738) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.

Lead Agency Name and Address

California Public Utilities Commission (CPUC)
Energy Division Infrastructure Permitting and CEQA Section
300 Capitol Mall, Suite 418
Sacramento, CA 95814

Lead Agency Contact Person and Phone Number

Mr. John E. Forsythe, AICP, Senior Project Manager
Energy Division, Infrastructure Permitting and CEQA Section
California Public Utilities Commission (CPUC)
telephone: (916) 327-6782
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Project Applicant’s Name and Address

San Diego Gas & Electric Company (SDG&E)
8330 Century Park Court, CP32A
San Diego, CA 92123
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email: ~~satkinson@semprautilities.com~~ EBeaver@semprautilities.com

¹ Ampacity is defined as the maximum amount of current that an electrical conductor can safely carry.

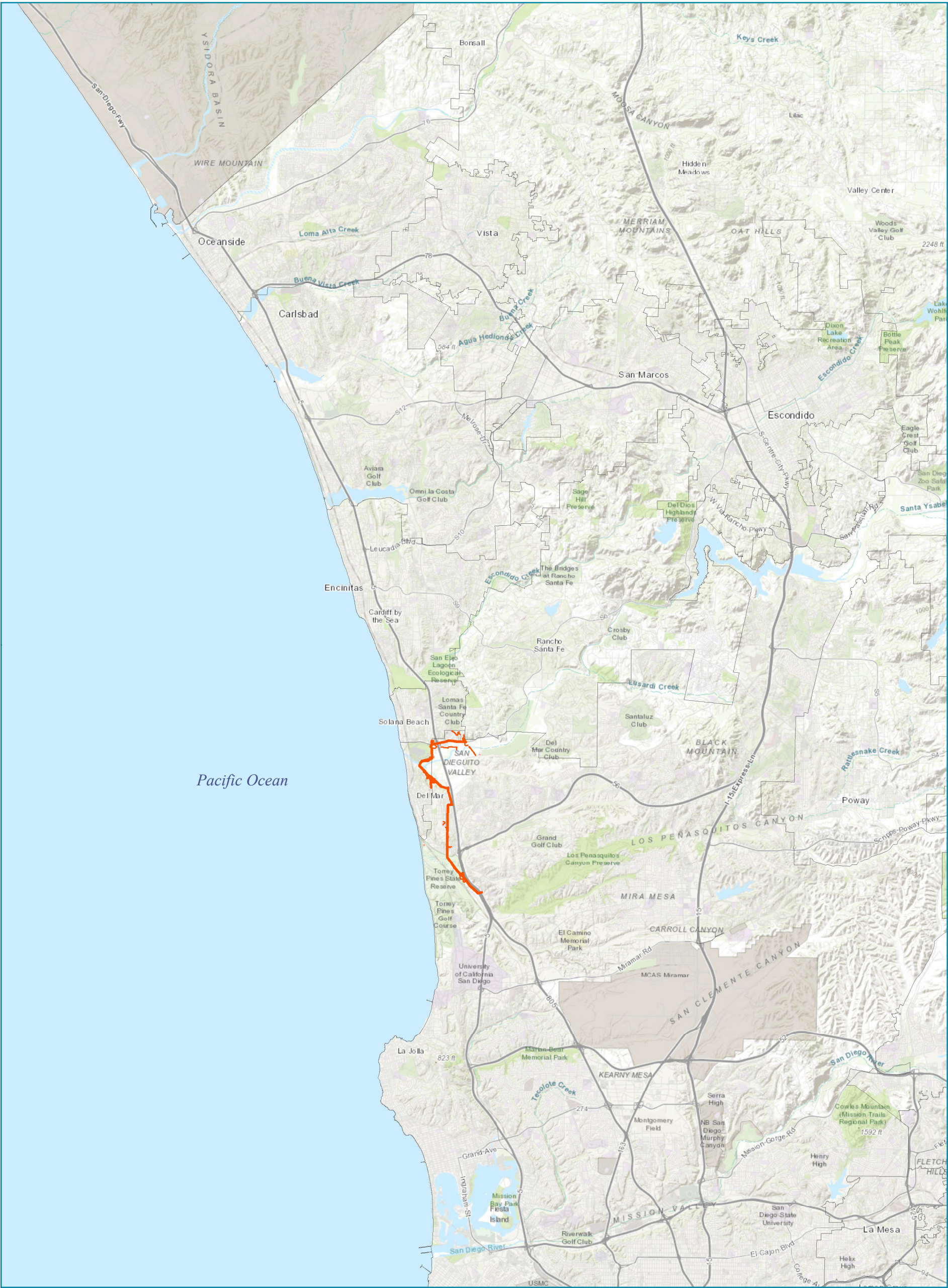
4.1 Project Location

The proposed project would be located in the city of San Diego and city of Del Mar almost entirely within the coastal zone, and partially located in the San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve, and Torrey Pines State Natural Reserve Extension (Torrey Pines Extension), as illustrated in Figures 4-1 and 4-2. The main activity activities associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the existing Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in the city of San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in the city of San Diego), and the potential replacement of an existing circuit breaker on substation property.

4.2 Project Applicant Objectives

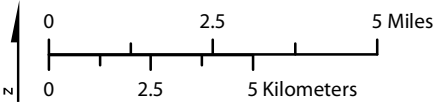
The applicant, SDG&E, indicates that implementation of the proposed project would address the following two objectives:

- Address the safety, environmental, and system reliability concerns in the Del Mar Substation area.*** TL666D is located within environmentally sensitive areas, including the San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines Extension. The project area's physical setting accommodates a variety of special status animal and plant species in diverse landscapes that include sandy beach, coastal wetlands, and bluff with terraces, plateaus, and ridges that reach up to 400 feet above sea level, interspersed with eroded canyons. Landscape features limit, and at some locations may completely impede, vehicular and equipment access necessary for repair and maintenance work on the power line and supporting infrastructure. Moreover, prior to conducting maintenance within the project area, SDG&E must first obtain permits from various government agencies with jurisdiction over natural resources and wetlands, waterways, and other protected lands in the project area. Multiple agency coordination and lead-time for processing, reviewing, and authorizing maintenance permits could affect SDG&E's responsiveness to outages, resulting in more time needed for restoration of service, which may conflict with standards required by CPUC General Order (G.O.) 165.
- Meet mandatory North American Electric Reliability Corporation (NERC) reliability criteria in the Del Mar Substation area.*** The proposed project would bring a more direct transmission source to the Del Mar Substation by replacing TL666D, which currently operates in an open position with TL6973, a new line with a higher rating that would be routed underground, away from environmentally sensitive areas. The applicant states that TL6973 would not experience thermal overload under the N-2 outage of TL610 and TL667 and could abate previously identified NERC reliability violations. By removing TL666D from the Del Mar tap and avoiding the need to address maintenance and repair work within environmentally sensitive areas, the proposed project would enhance SDG&E's Grid Operation Department's flexibility to configure the system for operation and maintenance (O&M) activities.



Project Location

Figure 4-1
Project Location
TL 674A Reconfiguration and
TL666D Removal Project
San Diego County, California
June 2018



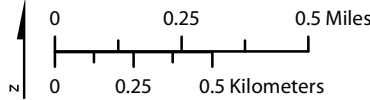
Sources: San Diego Gas and Electric (SDG&E) 2018; Earth Systems Research Institute (ESRI) 2018

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- Project Components**
- C510 Conversion
 - C738 Conversion
 - TL666D Removal
 - TL674A Reconfiguration
 - Access Roads
 - Drop Zone
 - Fly Yard
 - Staging Yard
 - Stringing Site
 - Work Area

Figure 4-2
Project Overview
TL674A Reconfiguration and
TL666D Removal Project
San Diego County, California
June 2018



Sources: San Diego Gas and Electric (SDG&E) 2018; Earth Systems Research Institute (ESRI) 2018; DigitalGlobe 2016

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4.3 Required Approvals

The California Public Utilities Commission (CPUC) serves as lead agency under the California Environmental Quality Act (CEQA), meaning it has primary responsibility for carrying out the environmental review of the proposed project. The CPUC must consider the proposed project's potential environmental impacts and mitigate them to the extent feasible prior to any decision on whether to approve the proposed project and issue a Permit to Construct. CEQA Guidelines Section 15124(d)(2) states that if a public agency must make more than one decision on a project, all of its decisions subject to CEQA should be listed, preferably in the order in which they will occur. Table 4-1 identifies the permits that the lead and responsible agencies may require of the applicant in order to implement the proposed project.

Table 4-1 Potential Permits and Approvals

Permit or Approval	Agency	Requirement
Federal Agencies		
Nationwide Permit	U.S. Army Corps of Engineers	Consultation to determine necessity for permit to conduct project-related activities in or adjacent to Waters of the United States
State Agencies		
Permit to Construct	California Public Utilities Commission	Environmental clearance under CEQA
Coastal Development Permit	California Coastal Commission ^(a)	For construction, operation and maintenance within the coastal zone.
Right-of-Entry Permit	California Department of Parks and Recreation	For construction, operation and maintenance within state park land.
Encroachment Permit	California Department of Transportation	For construction, operation and maintenance within, under, or over a state right-of-way.
General Permit	Water Resources Control Board	For stormwater discharges during construction.
Archaeological Resources Investigation and Collection Permit	California Department of Parks and Recreation	Permit to Conduct Archaeological Investigation/Collections on State Parks land
Paleontological Resources Investigation and Collection Permit.	California Department of Parks and Recreation	Permit to Conduct Paleontological Investigation/Collections on State Parks land
Local Agencies		
Encroachment Permit	City of San Diego	For construction, operation and maintenance within, under, or over City of San Diego rights-of way
Traffic Control Permit		
Access Permit	City of Del Mar	For construction, operation and maintenance within, under, or over City of San Diego rights-of way

Key:

(a) The California Coastal Commission extends its approval authority to local agencies that have adopted a Coastal Development Plan.

SDG&E must comply with CPUC G.O. 131-D Section III-B, which contains the permitting requirements for the construction of the proposed project.

4.4 Existing Electrical System

Figure 4-3 illustrates the existing configuration of the electrical circuitry and the circuits that are part of the proposed project. Table 4-2 lists the nine 69-kV power lines in the project vicinity and describes the interconnectivity of these lines. As shown in Figure 4-3, three existing tie lines (TL674A to North City West, TL674B to Rancho Santa Fe, and TL674C to Encinitas) create the Santa Fe tap at Pole Z119809. Three 69-kV power lines—TL610, TL666, and TL667—sourced from SDG&E’s Peñasquitos Substation feed into the Del Mar Substation. TL666 is a multi-terminal line that feeds into the Del Mar, Torrey Pines, Dunhill, and Doublet Substations.

Table 4-2 Existing Project Area Circuitry

Circuit	Network Component and Location
TL6662	Torrey Pines Substation to Del Mar Substation
TL666D	Del Mar tap to Del Mar Substation
TL667	Peñasquitos Substation to Del Mar Substation
TL610	Peñasquitos Substation to Del Mar Substation
TL660	Del Mar Substation to Encinitas Substation
TL6952	Peñasquitos Substation to North City West Substation
TL674A	North City West Substation to Rancho Santa Fe tap
TL674B	Rancho Santa Fe Substation to Rancho Santa Fe tap
TL674C	Rancho Santa Fe tap to Encinitas Substation

Segment D of TL666 (i.e., TL666D) extends approximately 6 miles from the Del Mar Substation to the Del Mar tap and, according to the applicant, has been highly susceptible to outages. Figure 4-4 illustrates the connectivity of the project area’s electrical network following implementation of the proposed project. In the proposed configuration, TL666D would be removed from the Del Mar Substation. TL674A would be removed from the Rancho Santa Fe tap, would be renamed TL6973, and would terminate at the Del Mar Substation. The proposed project involves removal of TL666D, comprising approximately 6 miles of existing 69-kV overhead tie line and the undergrounding of 12-kV distribution lines C510 and C738, as detailed in the following four components:

- **Reconfiguration of TL674A, which entails** Proposes the removal of approximately 700 feet of 69-kV overhead ~~tap~~ conductor and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;
- **Removal of TL666D**, which would eliminate approximately 6 miles of 69-kV overhead ~~tap tie~~ line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza Drive;
- **Conversion of C510**, comprising approximately 3,900 feet of an existing 12-kV overhead distribution line that would be undergrounded within San Dieguito and Racetrack View Drive as part of the proposed project; and
- **Conversion of C738**, approximately 630 feet of the existing C738 overhead 12-kV distribution line to an underground configuration.

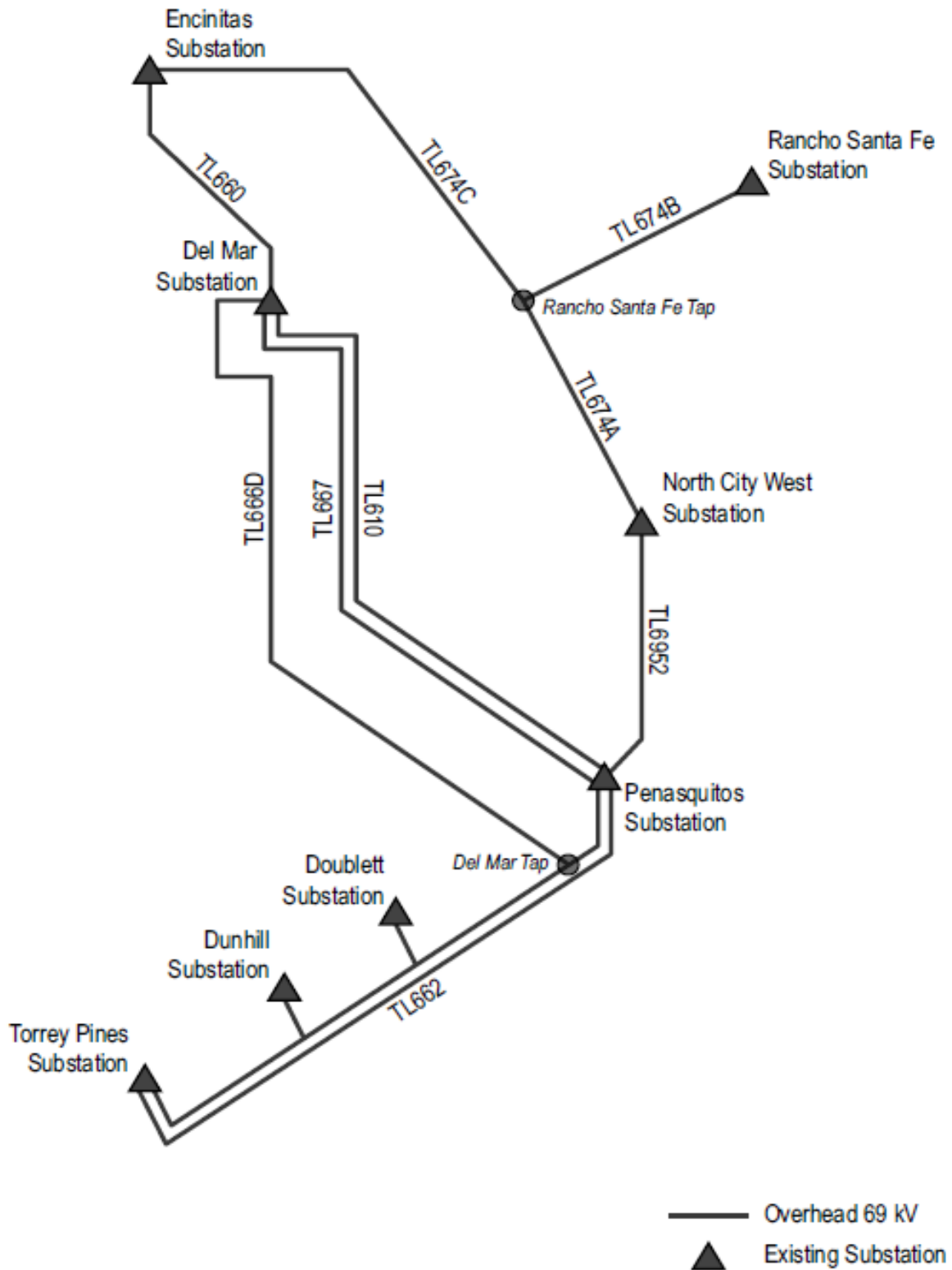


Figure 4-3 Existing System Configuration

Source: SDG&E 2017

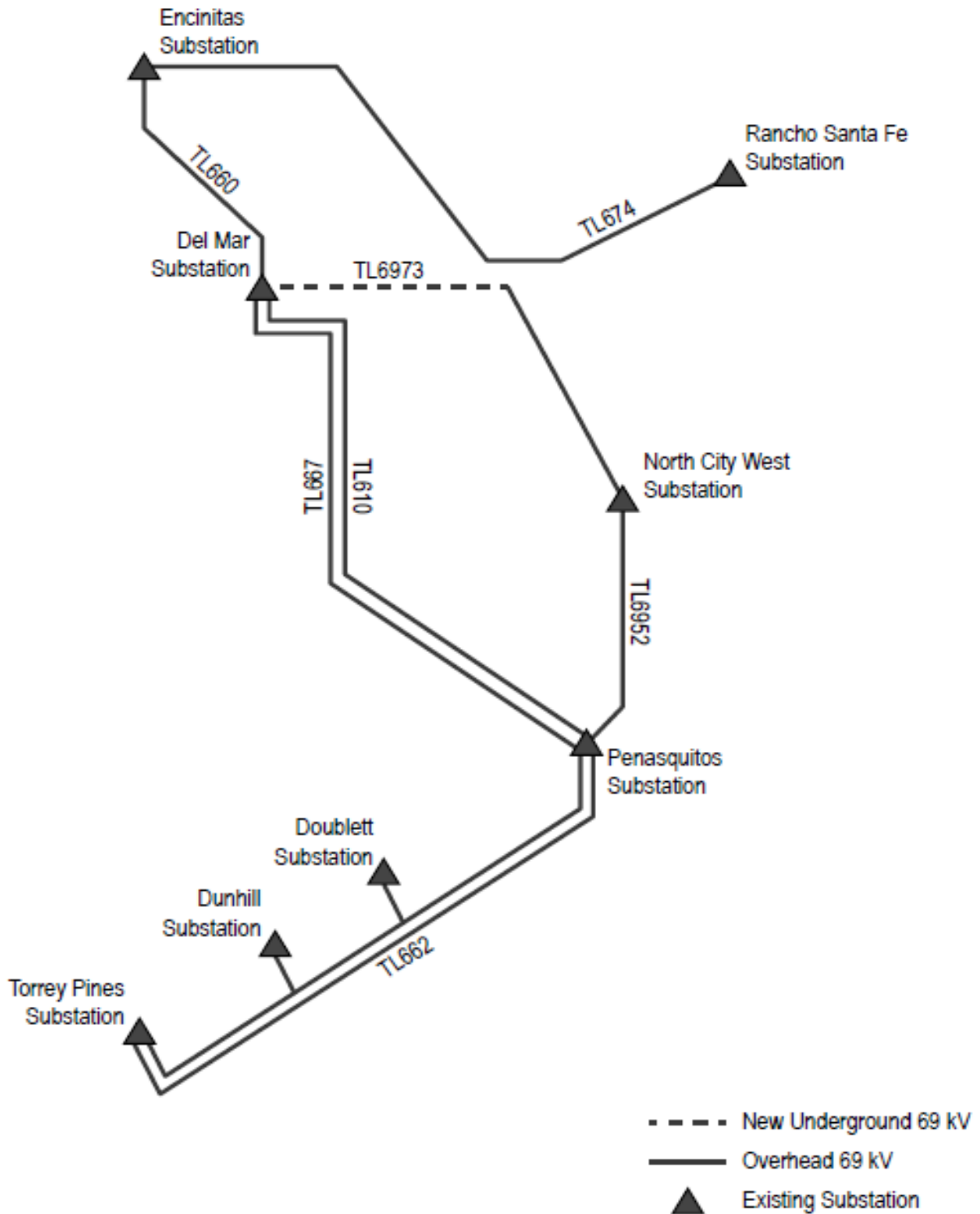


Figure 4-4 Proposed System Configuration

Source: SDG&E 2017

The proposed project may also require removal and replacement of a circuit breaker at the Del Mar Substation to accommodate the increased ampacity of TL6973D, which would have a higher voltage rating (and would be renamed TL6973).

4.5 Project Components

4.5.1 TL674A Reconfiguration

TL674A is an existing 69-kV overhead power line that connects the North City West Substation to the Rancho Santa Fe tap. SDG&E proposes to remove about 700 feet of existing overhead alignment as part of the proposed project. The remaining conductors would terminate at a new steel riser pole, where the line would transition to an underground configuration. Beginning at this location, SDG&E would install approximately 1.1 miles of underground 69-kV cable within a new duct bank that would terminate at the Del Mar Substation.

4.5.1.1 Overhead Poles and Conductors

To facilitate the reconfiguration of TL674A, one existing pole would be modified and two poles would be installed.

- Pole 1 currently functions as the Rancho Santa Fe tap, where TL674A, TL674B, and TL674C meet. The pole is approximately 70 feet tall in line with the existing TL674A overhead alignment, approximately 500 feet north of Via De La Valle. The pole's base diameter is approximately 4.5 feet, and it tapers to a diameter of 2.5 feet at its tip. SDG&E would remove existing framing, jumpers, and hardware as part of removing the TL674A overhead span between Pole 1 and Pole 2.
- Pole 2 would be a new, approximately 85-foot-tall, dilled steel pole that SDG&E would install directly adjacent to and south of Via De La Valle within the Del Mar Horsepark. The pole would be 3 to 4 feet in diameter at its base and taper to 1.5 feet at its tip. It would be installed on an approximately 7-foot-diameter concrete pier foundation with footings extending to a depth of 32 feet below ground surface (see Figure 4-5).
- Pole 3 would be a new, up to 85-foot-tall, dilled steel pole that SDG&E would install within the Del Mar Horsepark, directly in line with the existing TL674A overhead span. This direct-buried pole would measure 3 to 4 feet in diameter at its base and would taper to 1.5 feet at its tip (see Figure 4-6).

The overhead portion of TL674A would maintain its current single-circuit configuration. Each pole would carry three individual conductors. Pole 3 would transition the conductors from a horizontal to vertical configuration, with two conductors on one side of the pole and one conductor on the other. Pole 2 would have a vertical configuration, with three conductors located on one side. These conductors would connect to three polymer insulators mounted to cross arms. The span length between Pole 2 and Pole 3 would be approximately 550 feet; horizontal and vertical conductor spacing would be 6 to 7 feet.

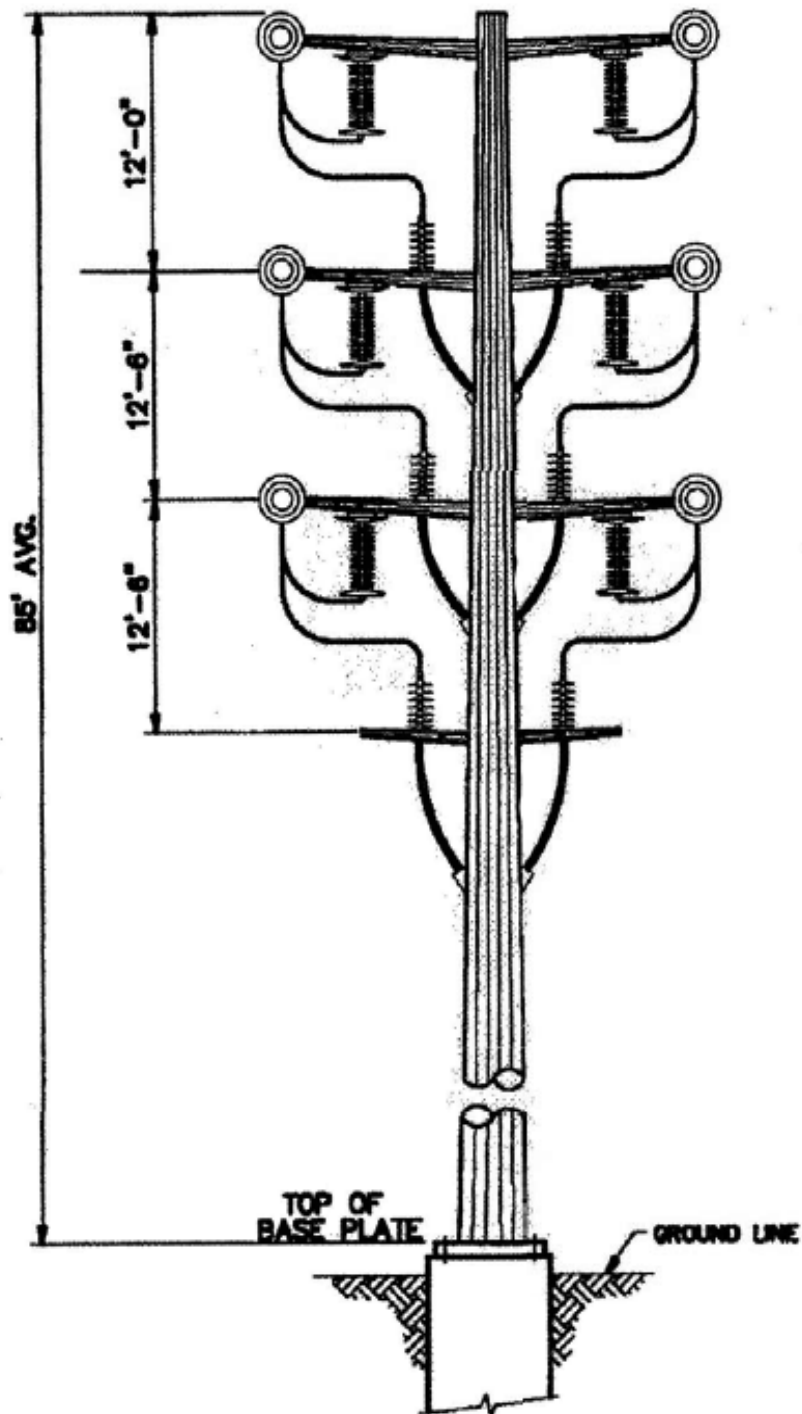


Figure 4-5 Proposed 69-kV Steel Riser Pole

Source: SDG&E 2017

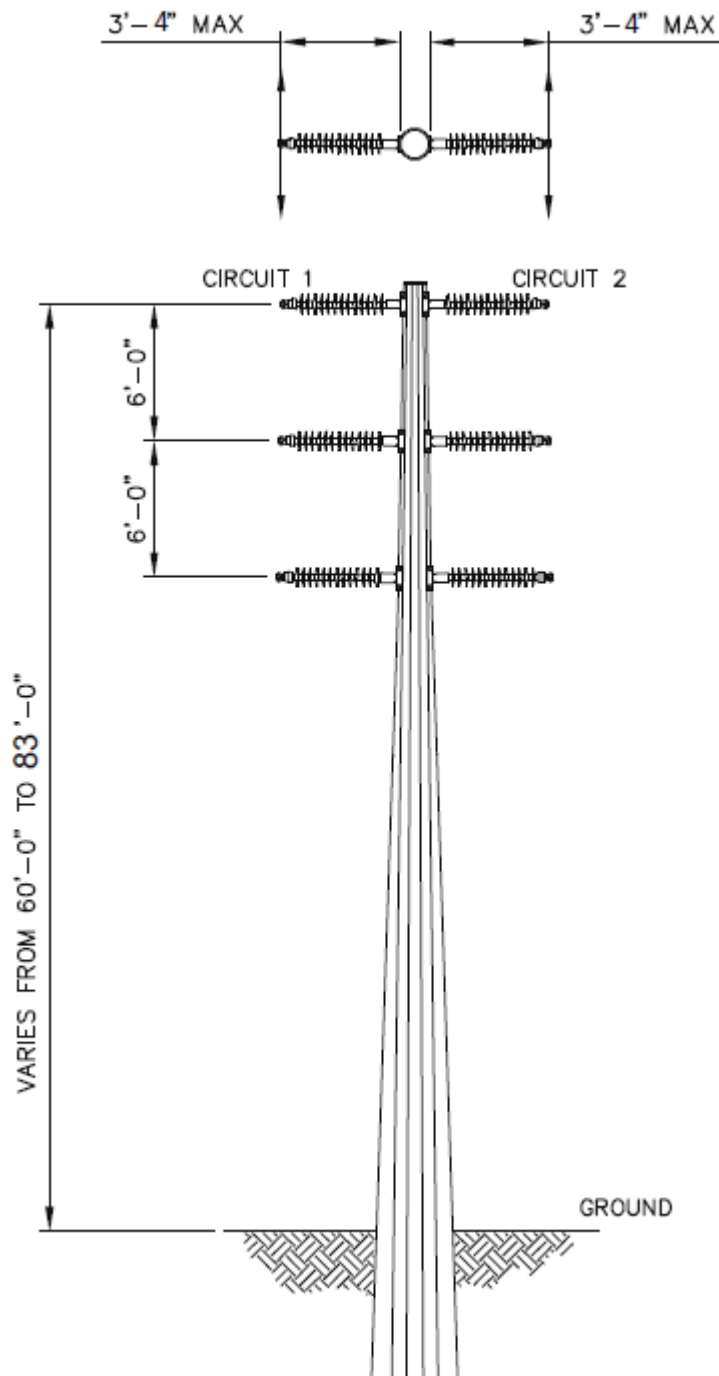


Figure 4-6 Proposed 69-kV Steel Pole

Source: SDG&E 2017

4.5.1.2 Underground Duct Bank, Splice Vaults and Cables

TL674A would transition from an overhead to underground configuration at Pole 2. From this point, SDG&E would construct approximately 1.1 miles of new underground duct bank to connect the 69-kV power line to the Del Mar Substation. The Underground duct bank would consist of ~~one~~ six approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete, as illustrated in Figure 4-7.

SDG&E would install four underground splice vaults along the TL674A alignment to facilitate pulling and splicing during installation and project operation and maintenance. ~~Ducts~~ Splice vaults would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8. SDG&E would install three individual 3,000 thousand circular mil (kcmil) copper cables within the duct bank to connect the new riser pole to the Del Mar Substation.

4.5.2 TL666D Removal

As described above, the reconfiguration of TL674A would eliminate the current Santa Fe tap by removing the overhead portion of the line from a pole at Via De La Valle. TL674A would be removed from the Rancho Santa Fe tap and would be henceforth known as TL6973 (or, the North City West-Del Mar Tie Line) upon project implementation. The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line, ~~eliminating a distribution line from the Del Mar Substation.~~

A description of the TL666D alignment is presented as the area where SDG&E would depower and remove existing overhead utilities from service. TL666D begins by exiting the fenced portion of the Del Mar Substation to the north, approximately 115 feet west following the substation's parcel line. It then veers south for approximately 690 feet, where it crosses Via De La Valle. The line spans Jimmy Durante Boulevard between two points (one entering the city of Del Mar, the other returning to the city of San Diego). TL666D continues approximately 2,200 feet to the south, then west for approximately 1,600 feet, entering the city of Del Mar, spanning Jimmy Durante Boulevard again, where it enters the Del Mar Fairgrounds parking lot. TL666D continues 850 feet to the southwest, adjacent the Del Mar Fire Department on Jimmy Durante Boulevard, veering southeast for about 550 feet while passing land containing commercial and light industrial uses before it enters the San Dieguito Lagoon.

TL666D extends 2,400 feet southeast across the lagoon and enters the city of San Diego. TL666D continues in the lagoon another roughly 800 feet to the southeast until reaching Racetrack View Drive. At Racetrack View Drive, TL666D continues to the southeast for about 2,300 feet through a residential neighborhood, where it veers to the south and parallels I-5 for approximately 2,700 feet adjacent to residential land uses before it orients to the west for approximately 650 feet, parallel to the southern boundary of Del Mar Hills Elementary School. TL666D then continues south on Mango Drive through residential neighborhoods for approximately 2,400 feet. It reaches the Torrey Pines State Natural Reserve Extension and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south. TL666D exits the reserve and continues south for approximately 2,100 feet, through a residential community to Carmel Valley Road.

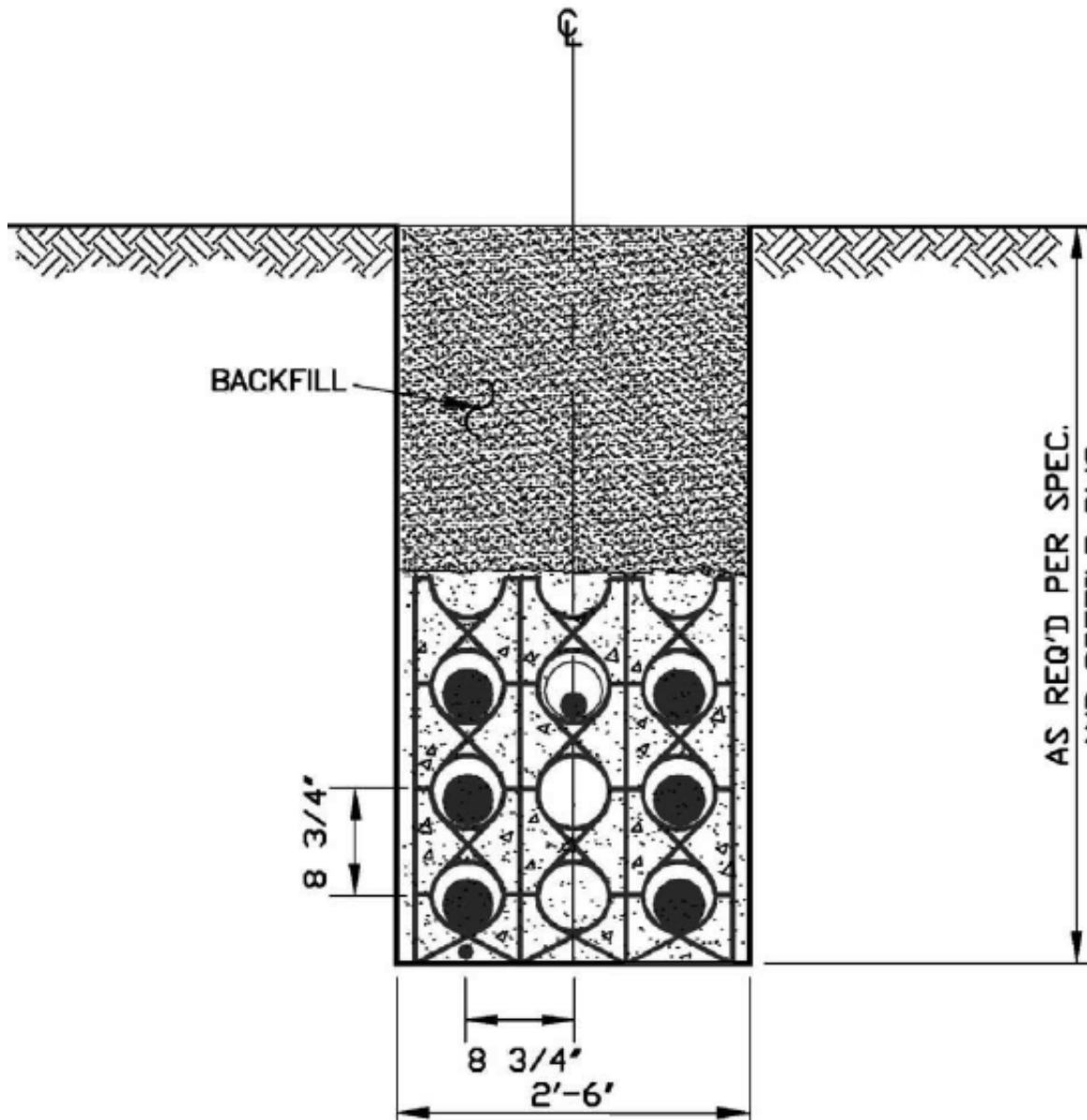
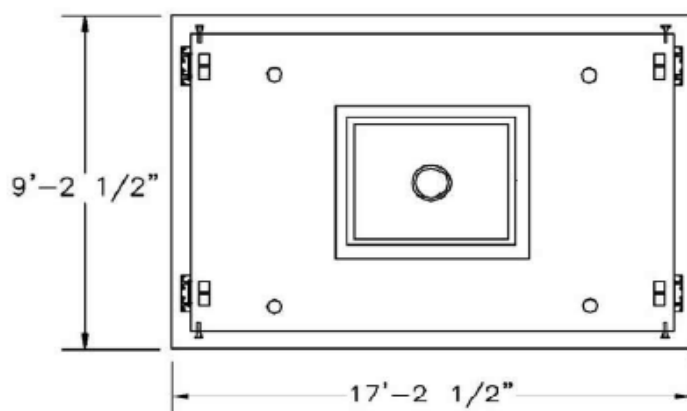
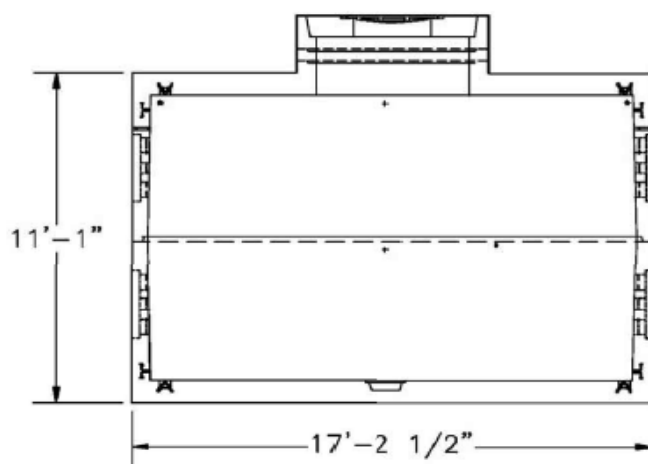


Figure 4-7 Proposed 69-kV Underground Duct Bank Cross Section

Source: SDG&E 2017



PLAN



ELEVATION

Figure 4-8 Proposed 69-kV Splice Vault (typical)

Source: SDG&E 2017

After crossing Carmel Valley Road, TL666D enters the Torrey Pines State Natural Reserve and Los Peñasquitos Lagoon, where the alignment continues about 3,800 feet to the southeast. TL666D then exits the reserve and continues for approximately 600 feet until reaching Sorrento Valley Road. The line continues for approximately 3,600 feet to the southeast through undeveloped and industrial areas, generally parallel to I-5. It then turns east and spans I-5 for approximately 650 feet until reaching a terminus at an existing steel pole on the eastern side of I-5.

Overhead Poles

A combination of 93 existing wood and steel single-circuit poles support the approximately 6-mile segment of TL666D that would be removed from service. Sixty-one of the 93 poles also support underbuilt 12-kV distribution conductors. Third-party telecommunication cables are also collocated at various locations along this section proposed for removal.

Table 4-3 inventories the changes in the number and type of utility poles resulting from reconfiguring TL674A and removing TL666D from service as part of the proposed project.

Table 4-3 Modified 69-kV Pole Summary

Pole Type	Action	Quantity	Top Diameter (feet)	Base Diameter (feet)	Height (feet)
Reconfiguration of TL674A					
New steel riser pole	Install	1	1.5	3.0 to 4.0	85
New steel pole	Install	1	1.5	3.0 to 4.0	65 to 85
Existing steel pole	Reconfigure hardware	1	2.5	4.5	70
Removal of TL666D					
Existing wood pole	Remove	34	1.0	1.5 to 2.0	65 to 85
	Top	51	1.0	1.5 to 2.0	65 to 85
	Reconfigure hardware	1	1.0	1.5 to 2.0	65 to 85
Existing steel pole	Top	6	1.5	3.0 to 4.0	65 to 85
	Reconfigure hardware	1	1.5	3.0 to 4.0	65 to 85

Source: SDG&E 2017

Existing wood poles are typically 65 to 85 feet tall, measure 1.5 to 2 feet in diameter at the base, and taper to approximately 1 foot at the tip. The existing steel poles range in height from 65 to 85 feet, measure 3 to 4 feet in diameter at the base, and taper to approximately 1.5 feet at the tip, as shown in Figure 4-9.

SDG&E would top all 69-kV poles that also support 12-kV distribution approximately 1 foot above the distribution level and would remove remaining poles entirely. Poles located within the San Dieguito and Peñasquitos Lagoons and the Torrey Pines Extension would be cut near ground level, and pole bases would be left in place to reduce the potential impact from disturbance to the surrounding area. In sum, SDG&E would remove 13 poles and would top five poles associated with the proposed project's TL666D component within the San Dieguito and Peñasquitos Lagoons and the Torrey Pines Extension.

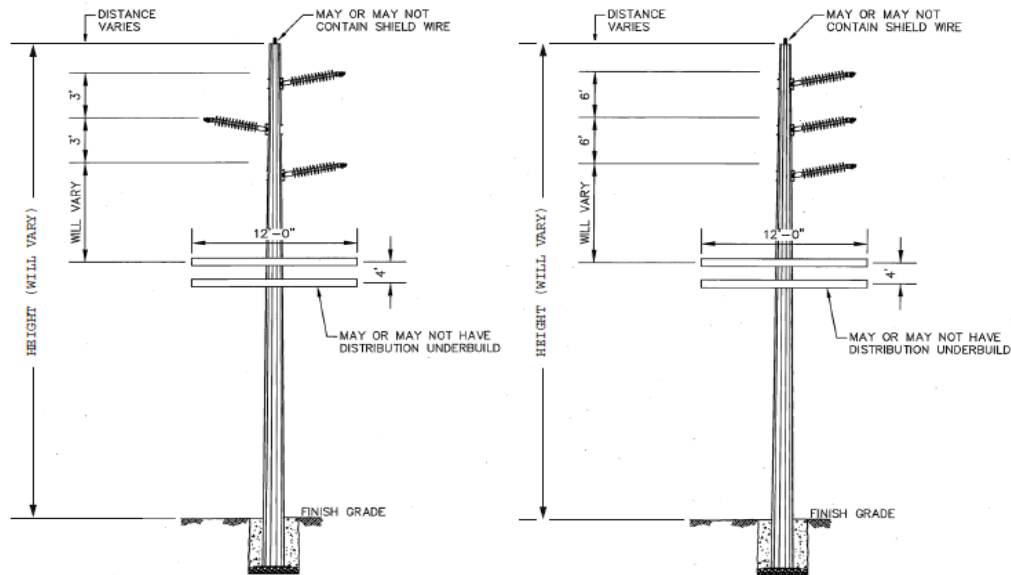


Figure 4-9 Existing Wood and Steel Pole, (typical)

Source: SDG&E 2017

Circuit Breaker Removal and Replacement

Circuit breakers safely control the flow of energy at all voltage levels across a grid by switching electrical currents on and off through the use of mechanical switching devices. When switched to an open position, breakers use insulation to cut currents immediately. When switched to a closed position, breakers ensure optimal current flow. Types of circuit breakers differ based on the method used to extinguish electrical arcs and interrupt current. The four most common types of breakers use air, oil, sodium hexafluoride (SF₆) or vacuum.

A total of eight 69-kV and 14 12-kV circuit breakers, transformers, switch gears, and other equipment are located at the Del Mar Substation, an approximately 48,520-square-foot outdoor facility enclosed by perimeter fencing underlain by a concrete pad. Since filing the project application and Proponent's Environmental Assessment (PEA) (SDG&E 2017) with the CPUC in June 2017, SDG&E has identified a possible need to replace one existing oil-filled circuit breaker, installed in 1990, in order to accommodate increased ampacity associated with TL6973, where it would feed into the substation as part of the proposed project. The breaker subject to possible removal is located along the substation's northern edge, about 60 feet east of its existing control building. According to the applicant, the removal of TL666D and connection of TL6974D with a higher voltage rating provides opportunity to modernize the breaker and associated hardware to current design standards, which specify use of SF₆ breakers.

SDG&E would prepare a detailed engineering review of the current substation foundation to determine whether the foundation would be adequate to support the new breaker. If the original foundation is not adequate to support the new circuit breaker, a new foundation would be designed and constructed. To commission the new circuit breaker, wiring within the boundary of the substation would be modified and/or replaced, as needed. If construction work were required, the replacement activities would occur

within the existing substation fence line. (See Sections 4.6.1, “Construction Workforce and Equipment”; 4.6.10, “Access;” 4.7.4, “Circuit Breaker Removal and Replacement”; and 4.8, “Schedule” for additional information relating to circuit breaker removal/replacement construction activities.)

4.5.3 C510 Conversion

C510 consists of approximately 2,800 feet of power line supported by poles associated with TL666D and about 1,100 supported feet by four existing wooden distribution poles that are 40 to 55 feet tall and measure approximately 1.5 feet in diameter at their base, tapering to about 0.75 feet in diameter at their tops. SDG&E proposes to remove five existing poles and convert 3,900 feet of C510 conductor from an overhead to an underground configuration.

Overhead Poles and Conductors

A new approximately 41.5-foot-tall wood riser pole (Pole 28) would be directly buried at the northwest end of the conversion segment, and one new, approximately 50-foot-tall, dulled steel riser pole (Pole 35) would be installed on a foundation at the southeast end of the conversion segment. In addition, one new, approximately 80-foot-tall, temporary direct-buried wood pole (Pole 122) would be installed near the steel riser pole to provide clearance for the existing wire. This temporary pole would be removed once the wood riser pole is installed.

These poles would connect the existing overhead portions of C510 to the new underground duct bank. They would measure approximately 1.5 feet in diameter at the base and taper to approximately 0.75 feet at the top. The foundation-mounted pole would be installed on an approximately 6- to 7-foot-diameter concrete pier foundation. The foundation would be approximately 20 to 30 feet deep and would include a concrete reveal or stickup of approximately 2 feet above grade. Pole 28 would be installed adjacent to an existing 69-kV wood pole east of San Dieguito Road, and Pole 35 would be installed where the current TL666D alignment spans Racetrack View Drive on the east side of the street. A drawing of these proposed poles is included in Figure 4-10.

Two new, approximately 50-foot-tall wood riser poles (Pole 38 and Pole 41) would also be installed to connect the new underground duct bank to existing overhead 12-kV distribution poles. These poles would measure approximately 1.5 feet in diameter at the base and would taper to approximately 0.75 feet at the top, illustrated in Figure 4-11.

C510 is currently configured with four individual conductors that are supported by associated poles in a horizontal configuration. These bare, stranded, copper conductors typically attach to poles by four individual polymer insulators. The overhead span lengths between poles currently vary, but average about 275 feet. Existing conductor would be transferred to the new wood riser poles near the new duct bank or may be replaced, if necessary. The remainder of the existing conductor would be removed.

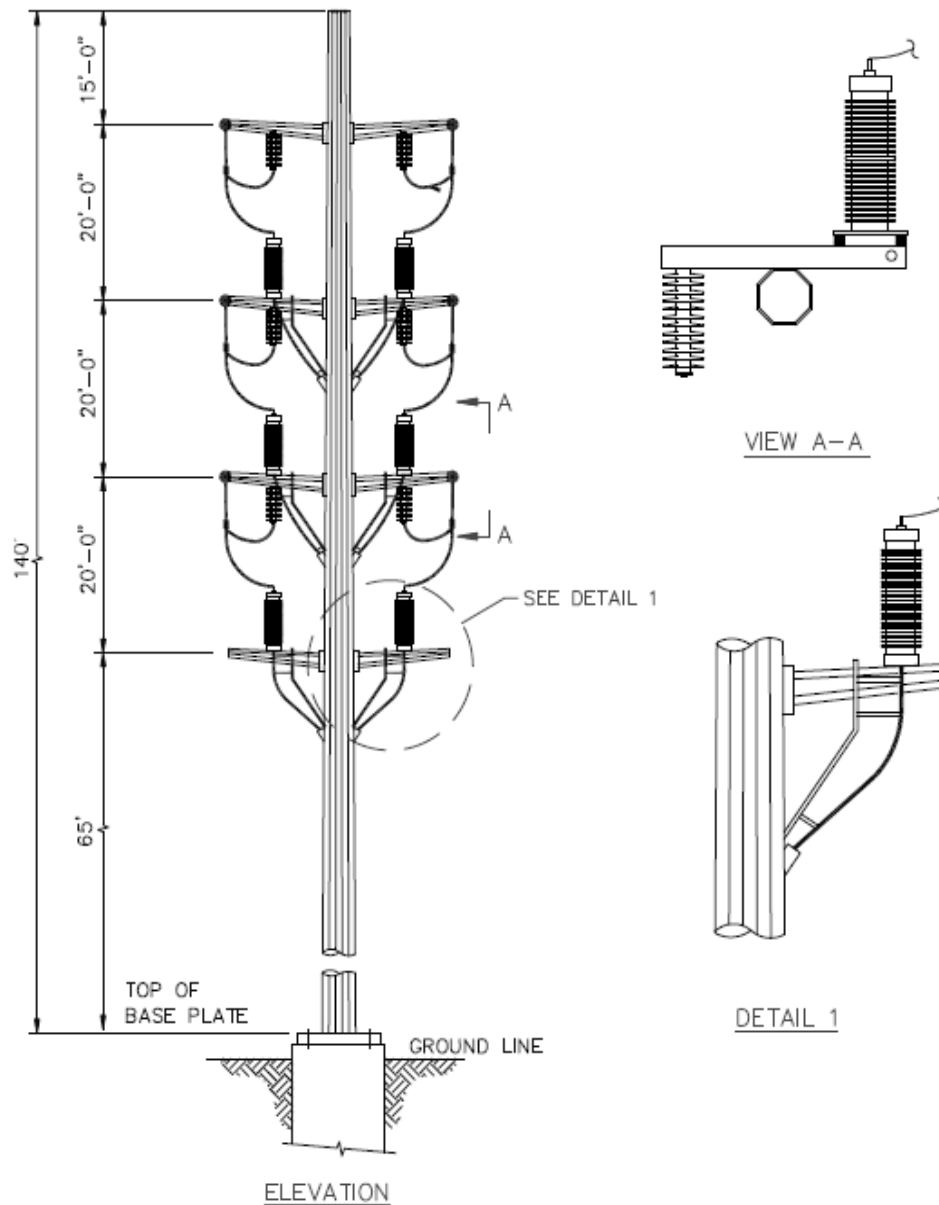


Figure 4-10 Proposed 12-kV Steel Riser Pole, (typical)

Source: SDG&E 2017

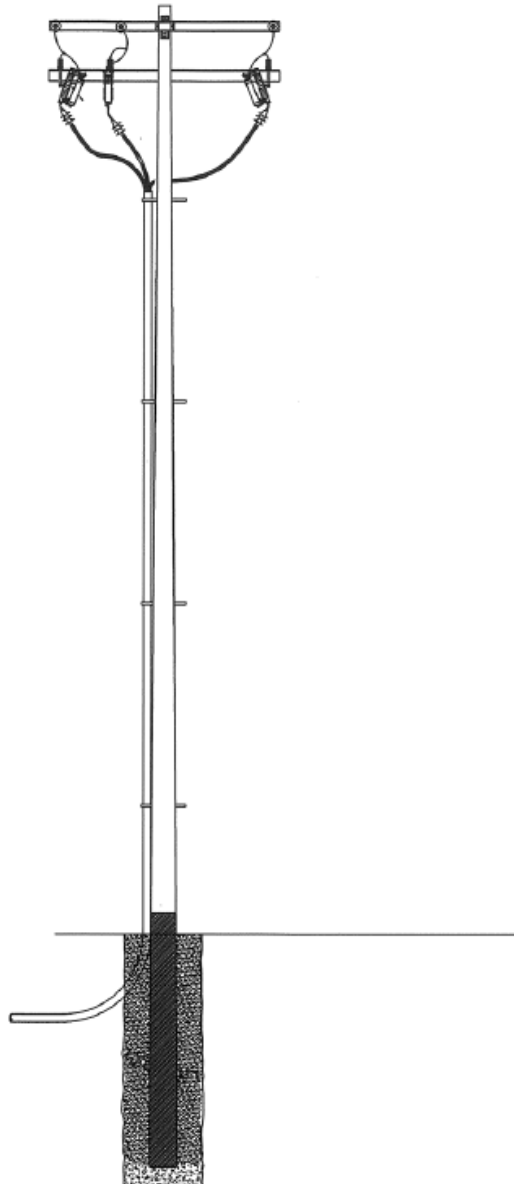


Figure 4-11 Proposed 12-kV Wood Riser Pole, (typical)
Source: SDG&E 2017

Underground Duct Bank, Hand Holes, Transformer and Cable

At each end of the conversion segment, C510 would transition from an overhead to underground configuration at the two riser poles installed along San Dieguito Drive and Racetrack View Drive. Between these two poles, approximately 3,600 feet of new underground duct bank would be constructed to maintain distribution service in the area. Each underground duct bank would comprise four 5-inch-diameter PVC conduits and one 4-inch-diameter PVC conduit encased in concrete, as depicted in Figure 4-12. The finished duct bank would be approximately 32 inches tall and 18 inches wide. Up to five underground hand holes with traffic covers would be installed along the alignment to facilitate pulling and splicing during installation and inspection, and repair during operation and maintenance. Precast hand holes would measure approximately 6 feet long, 9.5 feet wide, and 7 feet deep and are depicted in Figure 4-13.

As illustrated in Figure 4-14, an aboveground transformer would be installed on a 78- by 59-inch concrete pad along the underground route to facilitate the conversion of C510. The transformer would be contained within a steel enclosure and mounted on top of a pad. The pad would measure approximately 46 inches long by 46 inches wide by 50 inches tall, as illustrated in Figure 4-15. Insulated 1,000-kcmil aluminum cables would be installed within the duct bank to connect the two new riser poles and adjacent equipment.

4.5.4 C738 Conversion

SDG&E proposes to convert approximately 630 feet of existing overhead distribution within its rights-of-way (ROW) and the Sorrento Valley Pedestrian/Multi-Use Path to an underground configuration.

Overhead Poles and Conductors

The conversion of C738 would involve installation of one new 50-foot-tall, direct-buried wood riser pole (Pole 107) at the start of the conversion segment; conversion of one existing direct-buried TL666D wood pole to a riser pole (Pole 108) at the end of the conversion segment; and removal of two existing direct-buried wood poles from service (Pole 124 and Pole 125) between the beginning and ending poles. The poles would have a base diameter of approximately 1.5 feet and taper to approximately 0.75 feet at the top. SDG&E would modify one existing foundation-mounted steel distribution pole (Pole 127) and convert it to a stub pole to support the new, adjacent riser pole. This pole is approximately 45 feet tall, has a diameter of approximately 4 feet at the base, and tapers to approximately 1.5 feet at the top.

Currently, C738 is configured with four individual stranded copper conductors supported by associated poles in a horizontal configuration. The conductors are attached to poles using four individual grey polymer insulators. The overhead span lengths that SDG&E would remove within Peñasquitos Lagoon as part of the proposed project average approximately 190 feet.

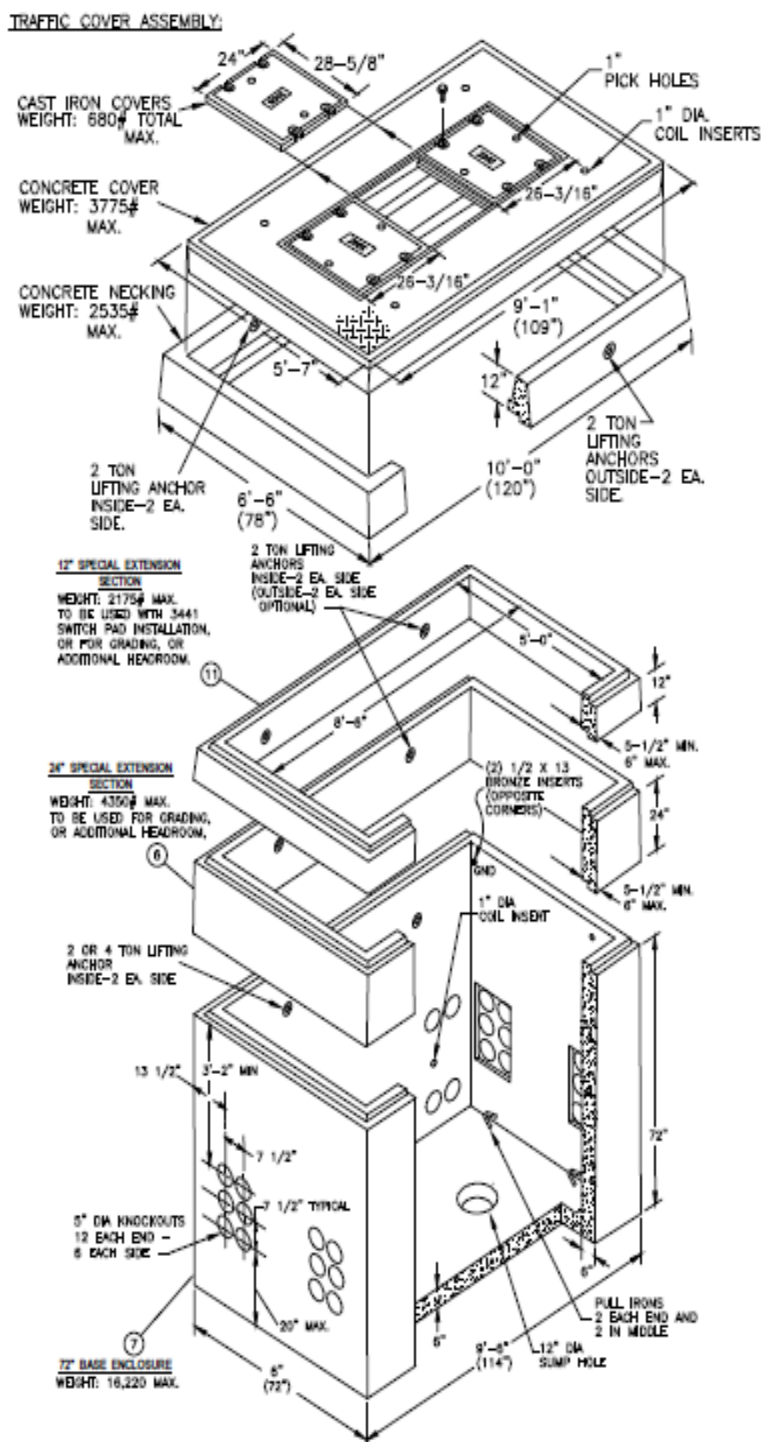


Figure 4-13 Proposed 12-kV Hand Hole (typical)

Source: SDG&E 2017

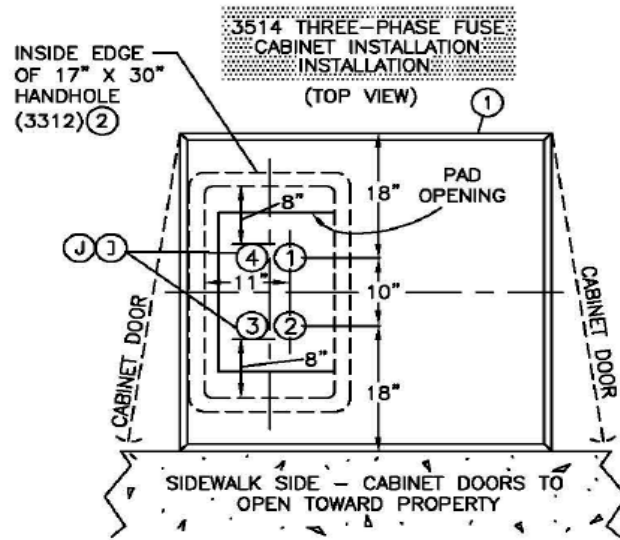
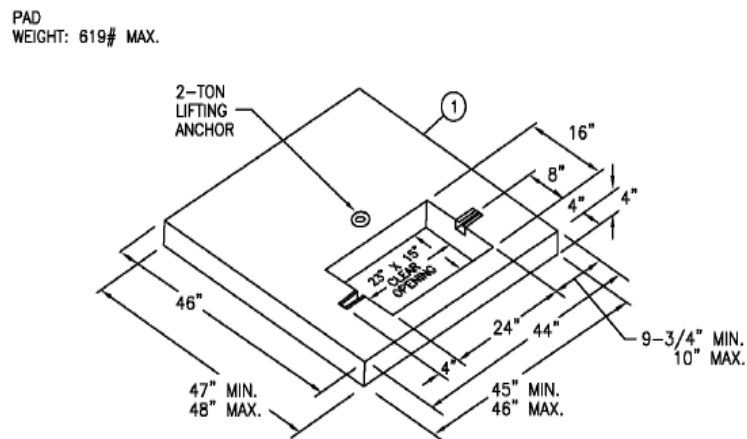


Figure 4-14 Proposed 12-kV Transformer Pad (typical)

Source: SDG&E 2017



The C738 line would transition from an overhead to underground configuration at the two riser poles that SDG&E would install along Sorrento Valley Pedestrian/Multi-Use Path at each end of the conversion segment. SDG&E would also install approximately 630 feet of new underground duct bank between these two poles to maintain distribution service in the area. Each underground duct bank would consist of two 5-inch-diameter PVC conduits encased in concrete. A single 1,000-kcmil aluminum cable installed within the duct bank would connect the ~~two~~ new riser poles to the newly converted riser pole. The finished duct bank would be about 8 inches tall and 18 inches wide. An existing underground hand hole would be used along the new underground alignment to facilitate cable pulling and splicing during installation and inspection, and for repair during operation and maintenance.

4.6 Project Construction

This section describes the construction workforce, equipment, and required temporary work areas, access, and methods that SDG&E and its contractors would typically implement to construct the proposed project. The entirety of project construction activities would be carried out within SDG&E's existing ROWs or within the franchise position of city of Del Mar and city of San Diego streets. According to the applicant, acquisition of new permanent ROW would not be required for the proposed project. For work that would occur within, under, or above a state or interstate highway ROW, such as removal of power line crossing I-5, the California Department of Transportation (Caltrans) requires applicants to obtain an encroachment permit.

4.6.1 Construction Workforce and Equipment

Construction of the proposed project would involve the work of construction crews, environmental monitors, inspectors, and SDG&E personnel. It is conservatively anticipated that a crew of up to 125 contractors and construction personnel could be actively employed onsite during peak construction periods. The overall number of crew members would fluctuate based on the specific daily scheduled task. Table 4-4 presents the types of construction equipment that SDG&E would use during project construction. Construction schedule information is presented under Section 4.8 "Construction Schedule."

Table 4-4 Construction Equipment Type and Use

Equipment Type	Equipment Use
Air Compressor	Operating air tools
Backhoe	Excavating trenches
Bucket Truck/Manlift	Erecting towers and installing conductors
Chainsaw	Cutting existing poles
Compactor	Compacting soil around structure
Concrete Truck	Pouring concrete
Crane Truck	Lifting and placing materials during excavation
Drill Rig with Augers	Excavating foundation
Dump/Haul Truck	Transporting excavated materials and importing backfill and debris disposal
Flatbed Truck	Delivering and removing poles to and from site
Forklift	Delivery and disposal of circuit breaker equipment
Handheld Compactor	Compacting soil around foundation

Table 4-4 Construction Equipment Type and Use

Equipment Type	Equipment Use
Helicopter	Removing poles/pole segments
Large Crane	Erecting and removing
Loader	Tractor with front bucket for moving materials
Maintenance Truck	Maintaining and refueling equipment
Pickup Truck	Transporting construction personnel
Puller and Tensioner	Pulling and securing conductor into correct position and tension
Reel Trailer	Feeding new conductor or collecting old conductor
Small Mobile Crane (12 ton)	Loading and unloading materials
Splice Trailer	Storing splicing supplies
Trencher/Ditch Witch	Excavating trenches
Water Truck	Suppressing dust Non-potable water transport for dust suppression

Source: SDG&E 2017.

4.6.2 Temporary Work Areas

Temporary work areas are defined in this Initial Study as publicly or privately owned spaces that SDG&E and its contractors would use to store and stage construction equipment and vehicles to conduct the various activities needed to complete construction of the proposed project within an estimated 12-month period. Temporary work areas are depicted in Figure 4-2, Appendix J, and in Table 4-5.

Table 4-5 Temporary Work Area Requirements

Project Component	Workspace Type	Quantity	Dimensions (feet)	Area (acres)
TL674A Reconfiguration	Pole Work Area	1	250 by 100	0.36
		1	230 by 100	0.23
	Overhead Stringing Site	1	100 by 15	0.03
	Underground Stringing Site ^(a)	4	150 by 25	0.34
	Underground Work Area	1	6,000 by 30	4.13
TL666D Removal	Pole Work Area	94	20 (diameter)	0.68
	Stringing Site	22	250 by 100	2.53
		1	250 by 100	0.06
	Guard Structure Work Area	17	50 by 50	0.39
	Helicopter Drop Zone	6	16 by 16	0.04
		10	10 by 10	0.02
C510 Conversion	Pole Work Area	1	3 (diameter)	< 0.01
		1	4 (diameter)	< 0.01
		6	20 (diameter)	0.04
		1	215 by 30	0.15
		1	150 by 60	0.21
	Underground Work Area ^(b)	1	3,600 by 20	1.65
C738 Conversion	Pad-mounted Transformer/ Fuse Cabinet Installation Area	1	100 by 20	0.05
	Pole Work Area	5	20 (diameter)	0.04
	Underground Work Area	1	630 by 20	0.29

Table 4-5 Temporary Work Area Requirements

Project Component	Workspace Type	Quantity	Dimensions (feet)	Area (acres)
All	Staging Area/Fly Yard	1	390 by 200	1.1
		1	400 by 400	3.67
		1	250 by 250	1.43
		1	200 by 200	0.92
Total		180	--	18.19

Source: SDG&E 2017.

Notes: Information is considered preliminary and is subject to adjustment based on final engineering and ground conditions at the time of construction. Total actual workspace area required would be less than the total indicated in the table due to overlapping workspaces.

(a) Stringing sites associated with reconfiguration of TL674A would also be used to install underground vaults.

(b) Underground work area associated with C510 conversion would also be used for installation of hand holes and installation/removal of cable/conductor.

Temporary work areas are intended to accommodate installation of new poles (see Section 4.6.4, “Pole Work Areas,” for more information); facilitate access to and construction of underground duct banks and related facilities; enable removal and modification of existing poles and installation and removal of conductor and cable; and store and stage construction equipment and materials. Preliminary staging and temporary work area locations are illustrative of the types of spaces that could be used for construction staging and storage. For example, the majority of temporary work areas are related to the removal or modification of utility poles. For each pole where removal, topping, or replacement work is scheduled, SDG&E has designated a work area sufficient to access and complete the construction activities necessary at that particular site.

The precise locations, configurations, and quantity of temporary work areas may change, as necessary, at or prior to commencement of construction due to specific site conditions, to ensure that a safe and adequate work area is available for crews in the field.

All temporary work areas would be accessed by construction equipment using a combination of existing access roads, overland travel, all-terrain vehicle paths, or on-foot access, as described in Section 4.6.10 “Access.” All work areas would be restored as described in Section 4.7, “Methods.” Temporary work sites may be altered to avoid potential impacts associated with construction activities on environmentally sensitive land or on biological resources, in light of analyses and mitigation, as applicable in Chapter 5, “Environmental Setting and Impacts.”

4.6.3 Stringing Sites

Approximately 24 stringing sites would be established to provide a safe working space for the installation and removal of overhead conductors. Stringing sites would typically be approximately 100 feet long and 50 feet wide; however, in some locations, smaller sites may be deemed sufficient. Stringing sites would be located adjacent to existing or proposed poles in line with the overhead alignment. The approximately 24 stringing sites would require approximately 2.62 acres of land in total. SDG&E does not anticipate a need to grade any of the temporary stringing sites.

SDG&E would designate four stringing sites for the installation of new underground conductors associated with the TL674A reconfiguration. Each stringing site would be centered on a vault location and require about 150 by 25 feet of space. Pull sites would require approximately 0.34 acres of land in

total. While grading of these sites is not expected, excavation for trenches and vaults would occur in these locations.

4.6.4 Pole Work Areas

To accommodate construction equipment and installation, topping, and removal of the power line and distribution poles, temporary work areas would be established at each pole location identified for removal or topping. A total of approximately 111 work areas, with a combined total of approximately 1.72 acres of land area, would be required for pole work as summarized in Table 4-5. Pole work areas would generally surround existing or proposed pole locations; however, the actual workspace would vary in shape and size and would be determined based on-site conditions and access requirements to ensure a safe and adequate work area for construction crews.

Construction vehicles, equipment, and materials may need to be staged away from existing access roads and/or outside of delineated temporary work areas to maintain a safe working space for crewmembers working directly under poles. For work in environmentally sensitive areas, an onsite biological monitor would direct crews to appropriate staging areas for construction vehicles, equipment, and materials.

4.6.5 Underground Construction Areas

SDG&E would establish underground construction areas centered on each duct bank alignment to accommodate installation of underground duct banks, vaults, and hand holes associated with the proposed reconfiguration of TL674A and conversion of C510 and C738 conductors. Reconfiguring TL674A's 69-kV duct bank would require an approximately 30-foot-wide workspace. Converting the C510 and C738 12-kV duct banks would require an approximately 20-foot-wide workspace. SDG&E would establish underground construction areas prior to the commencement of construction for removal of conductors and for installation of hand holes and cable. Construction areas would be located predominately within existing streets and previously disturbed areas and would require a total of approximately 5.8 acres of space.

4.6.6 Guard Structures and Temporary Poles

Prior to removing existing conductors and installing new overhead conductors, SDG&E would install temporary guard structures at road crossings and other locations where the existing or new conductors could come in contact with existing electrical and communication facilities, or with vehicular and/or pedestrian traffic in the event the line were to accidentally fall during stringing operations. Guard structure types could include boom and bucket trucks and embedded wood poles with cross beams. Local site conditions would dictate guard structure type. In paved areas, for example, SDG&E may use boom or bucket trucks. Depending on configuration and location, installation of each guard structure could require a footprint of approximately 1,000 square feet of temporary workspace. SDG&E estimates that project construction would require 17 guard structures that would amount to 0.39 acres to accommodate all proposed project guard structures.

SDG&E anticipates that the C510 conversion would require installation of two temporary poles, depicted in Appendix J, to hold conductor while new riser poles would be installed. SDG&E estimates that each

temporary pole would require an approximately 20-foot-diameter work area (approximately 0.01 acre in total).

4.6.7 Temporary Construction Staging Areas and Fly Yards

As shown in Figure 4-2 and Appendix J, the proposed project would include four temporary construction staging areas and fly yard sites that would have footprints ranging from approximately 200 by 200 feet to 400 by 400 feet. These temporary spaces include:

- Durante Fly Yard: Jimmy Durante Boulevard between Del Mar Fairgrounds and Golf Center;
- Del Mar Heights Fly Yard: Mira Montana Drive at Del Mar Heights Elementary School softball diamond;
- Torrey Pines Fly Yard: McGonigle Road, North Beach parking lot at Torrey Pines State Beach; and
- Pumpkin Patch Fly Yard: near the intersection of El Camino Real and San Dieguito Drive.

Because temporary staging areas and fly yards would be located on flat, previously disturbed, or developed areas, grading of staging areas is not anticipated. Construction staging areas would function as locations where crews could park at the beginning of the morning shift. If not already present, SDG&E would install perimeter fencing around construction staging yards to ensure adequate security and screening of these sites. Crews may also use gravel as a surface cover to reduce fugitive dust and avoid unnecessary off-site sediment transport. Staging area sites could be used for the following purposes:

- Refueling areas for vehicles, helicopters, and construction equipment by a mobile fueling truck;
- Equipment wash stations;
- Pole assemblage;
- Storage of material and equipment;
- Storage containers;
- Construction trailers;
- Portable restrooms;
- Parking;
- Lighting; and
- Generator use for temporary power in construction trailers.

SDG&E would use the four staging areas and fly yards to stage helicopters and refuel, store, assemble, and pick up construction equipment and materials. SDG&E would use helicopters to facilitate conductor and pole removal in wetland and other sensitive areas where access limitations would preclude the use of ground-based crews, such as within the San Dieguito and Peñasquitos Lagoons. SDG&E would stage helicopter flights from local airports (e.g., Montgomery Field, Gillespie Field, or Palomar Airport) and would use construction-staging sites as collocational landing areas.

Helicopter flight paths would follow SDG&E's existing ROW, to the greatest extent practical. In instances where helicopters would depart from surface ROWs, they would be directed to follow the most direct path feasible between points of departure and supporting staging area and fly yard. Helicopters could be in use for up to 10 days during project construction. SDG&E would implement best management practices at the staging areas and fly yards intended to minimize the potential operational effects associated with helicopter use (see Sections 5.3, "Air Quality," 5.8, "Hazards and Hazardous Materials," and 5.12, "Noise" for more information).

4.6.8 Helicopter Drop Zones

Figure 4-2 and Appendix J depicts the 16 drop zones that SDG&E has established to support helicopter operations during construction. SDG&E intends that drop zones would be used for delivery and removal of equipment, materials, and construction crewmembers conducting pole removal and topping work within the San Dieguito and Peñasquitos Lagoons. SDG&E notes that drop zones would be located in dry, upland areas, thus avoiding the need to grade or substantially prepare. There would be two sizes of drop zones in use during project construction, which would have footprints of roughly 10 by 10 feet (100 square feet) or 16 by 16 feet (256 square feet). The sum of the area of all 16 drop zones would account for approximately 0.1 acres of land. The drop zones would facilitate equipment transfer and crew access to pole sites where SDG&E would remove 13 poles, top five poles, and replace one pole where jurisdictional wetland areas and survey data suggest associated with the TL666 component of the proposed project.

4.6.9 Permanent Work Areas

The proposed project would be located predominantly within existing utility corridors and paved franchise areas that are currently improved and maintained. Existing work areas and roads in addition to a limited number of additional permanent work areas would remain following construction. Permanent work areas, as summarized in Table 4-6, are those that SDG&E anticipates using for access and maintenance when the proposed project is operational. These work areas would be created from and contained within the temporary work areas described in Section 4.6.2, "Temporary Work Areas," and summarized in Table 4-5.

Table 4-6 Permanent Work Area Summary

Work Area Type	Quantity	Dimensions (feet)	Total Area (acres)
New Structure Operation Work Pads ^(a)	8	30 (diameter)	0.13
69-kV Vaults ^(b)	4	50 by 20	0.10
12-kV Hand Holes ^(b)	5	6.5 by 2	<0.01

Source: SDG&E 2017.

Notes: The information presented herein is based on preliminary engineering and is subject to change. All new structure work pads would be located within SDG&E's existing power line corridors. All permanent work areas associated with underground vaults and hand holes would be located within City of Del Mar and City of San Diego streets.

^(a) Permanent structure operation work pads would be contained within the temporary structure installation work areas.

^(b) Most underground vaults and hand holes would be located below ground; therefore, only the size of the opening is considered a permanent work area.

4.6.10 Access

Access to proposed work sites would be provided by existing public roadways and a network of existing access roads, all-terrain vehicle (ATV) roads, and footpaths. Existing and temporary access roads and paths are depicted in Figure 4-2. Access road and path characteristics are summarized in Table 4-7.

Table 4-7 Road Access Characteristics

Type of Road	Description	Width (feet)	Length (feet)	Area (acres)
Existing Dirt / Gravel Road	Typically, a double-track road that may have been graded previously. No other preparation required, although a few sections may need to be re-graded and crushed rock may be applied in very limited areas for traction.	12	4,030	1.11
Existing ATV Road	Vegetation trimming/removal may be required.	8	1,400	0.26
Existing Footpath	No preparation required. Typically, grassy areas that are relatively flat. No restoration will be necessary.	2	5,350	0.25
Temporary Footpath	Vegetation trimming/removal may be required.	2	47,700	0.35
<u>Paved public roadway characterized as two-lane Community Collector, with continuous turning lane in project area.</u>	<u>Access to Del Mar Substation provided from private driveway off of Via de la Valle</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Source: SDG&E 2017.

Key:

ATV = all-terrain vehicle

N/A = not applicable

The various road types are intended to allow construction crews and their equipment access to pole locations where removal or topping work is planned. SDG&E may determine that smoothing or refreshing of access road surfaces and/or vegetation clearance along access ways may be necessary to ensure safe conveyance prior to use. When warranted, SDG&E would remove any cleared vegetation from the work site or access road and would dispose of it at approved off-site facilities. Vehicle access would be restricted to existing roads, previously disturbed areas, and designated temporary work areas, where feasible and as condition by project-specific access and construction traffic management plans (see Section 5-16, "Transportation and Traffic," for more information).

Vehicle access to the Del Mar Substation would be achieved from the substation's existing private driveway that leads from Via de la Valle. At the beginning of the workday, crew members would typically meet at one of the proposed project's staging areas/fly yards and leave personal vehicles parked at these locations. From there, crew trucks and other vehicles would travel to and park within the existing substation. Some temporary parking south of the substation along Via de la Valle may be required, depending on the construction activities occurring on a particular day. Additional temporary parking (outside of the substation parking lot) would allow for maneuvering of vehicles, equipment, and material deliveries, including during peak construction periods. The applicant does not anticipate a need for street parking on the west side of the substation.

SDG&E would establish a network of temporary footpaths for crews to access the San Dieguito and Peñasquitos Lagoons. These footpaths would link pole work sites to adjacent roadways and helicopter drop zones. Temporary footpaths would be approximately 2 feet wide and in some locations would cross environmentally sensitive areas characterized as wetlands or non-wetland waters by any or all of the following public agencies with jurisdictional regulatory authority over such lands: U.S. Army Corps of Engineers, California Department of Fish and Wildlife, Regional Water Quality Control Board, and/or California Coastal Commission. Access and activity in such areas would be subject to the provisions of those authorities and conditions identified in this Initial Study (see Sections 5-4, “Biological Resources,” 5-8, “Hazards and Hazardous Materials,” and 5-9, “Hydrology and Water Quality,” for more information).

4.6.11 Vegetation Clearance

Because much of the proposed project’s electrical alignments are predominately within existing urban settings, extensive vegetation clearance is not expected to occur as part of project construction. It is anticipated that project construction may necessitate some vegetation removal to prepare construction areas for use. SDG&E would use mowers, excavators, and/or hand tools to clear vegetation from work sites. Section 5.4, “Biological Resources,” contains a detailed discussion of the proposed project’s vegetation clearing requirements. Furthermore, the proposed project would also not necessitate removal of any trees; however, a limited number of trees may require pruning to ensure that construction areas are accessible and clear of obstruction. Trimming would reduce the potential of exposing trees to electrical lines, which could result in power outages. When necessary, tree trimming would be managed by a two-person crew using a one-person aerial lift truck, and a chipper trailer.

4.7 Methods

The following section describes the activities and methods that SDG&E and its construction contractors would commonly employ in electrical infrastructure projects. The following descriptions of construction and installation methods are broadly representative of the methods used for similar types of projects. Construction procedures may vary slightly along each proposed project component’s alignment or at any particular location because physical conditions are variable in the field and circumstances may require reducing, avoiding, or eliminating the proposed project’s potential environmental impacts at a given work site. As such, construction methods describing the implementation of the proposed project are generalized but are sufficient for purposes of environmental review.

4.7.1 Overhead Power Line Construction

Foundation-Mounted Pole Installation

Prior to installation of pole foundations, SDG&E or its contractors would prepare pole sites by clearing vegetation and grading sites flat or in a terraced fashion, as needed. SDG&E would spread excavated soils over existing access roads and work pads as appropriate, or would dispose of them off site according to all applicable laws.

Crews would use a large auger to excavate 6- to 7-foot-diameter holes to a depth of 20 to 30 feet to construct and secure concrete pier foundations. ~~In the event that~~ If crews determine soils to be unstable,

1 steel casings may be incorporated into the excavated cavity to stabilize the sides of excavated pits.
2 Following excavation, a reinforcing steel cage and anchor bolt cage would be installed in each hole. Steel
3 cages and anchor bolt cages would typically be assembled at one of the proposed project's staging areas
4 or fly yards and transported to the pole site. Foundations would require approximately 20 to 45 cubic
5 yards of excavation, and a slightly greater volume of concrete would be placed into the holes, because
6 foundations would extend approximately 2 feet above ground surface. Once poured, concrete foundations
7 would cure for seven days to up to one month, during which time crews would remove concrete forms
8 and backfill around the foundations, as needed.

9
10 Once foundations cured, flatbed trucks would deliver new steel poles to work sites in one or more
11 sections. Crews would use a truck-mounted crane to raise the pole into place at its designated location for
12 assembly. Single-circuit riser poles would have three cross-arms and would support one circuit on one
13 side of the pole. Cross-arms would be bolted to the pole, and insulators would be bolted to the cross-arms.
14 After assembly, a large crane would lift and set pole sections into place on anchor bolts embedded in the
15 concrete foundation. Nuts would then be threaded onto the anchor bolts and tightened.

16 17 **Direct-Buried Pole Installation**

18 Installation of direct-buried poles would begin with the excavation of holes measuring approximately
19 3 feet in diameter and approximately 8 to 12 feet deep, depending on the type and height of the pole.
20 Holes would typically be drilled using a truck-mounted auger or similar equipment and would result in
21 excavation of 2.1 to 3.1 cubic yards of soil. New poles would then be delivered to the site and placed in
22 the excavated area with a small crane. The annular space (annulus) between the poles and holes would
23 then be backfilled with concrete. Any remaining excavated material would be placed around the poles,
24 spread at adjacent areas, or disposed of off-site at an approved facility.

25 26 **Guard Structure Installation**

27 SDG&E would install temporary guard structures at road crossings and other locations where existing or
28 new conductors could come in contact with existing electrical and communication facilities, or vehicular
29 and/or pedestrian traffic in the event that the line ~~were~~ was to accidentally fall during stringing operations.

30
31 Guard structures would be installed using the same methods employed for direct-buried wood poles. As a
32 result, concrete foundations would not be required, and no grading or other site work for guard structures
33 is anticipated. The temporary guard structure poles would be removed following the completion of
34 conductor stringing operations, and holes would be backfilled with excavated soil. Staged boom or bucket
35 trucks may be used as a substitute for embedded wood guard structures.

36
37 For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings
38 would require an encroachment permit from Caltrans. The proposed project would include removing
39 approximately 615 feet of overhead powerline associated with eliminating service on TL666D. A portion
40 of TL666D spans between Pole 106 on the northeast (northbound) side of I-5 and Pole 105 on I-5's
41 southwest (southbound) side. SDG&E would be required to obtain an encroachment permit and road
42 crossing approvals for the work and implement permit conditions, which may include special guard
43 structure procedures, traffic control, and/or netting, as directed by Caltrans.

Conductor Removal

Following guard structure installation, SDG&E would coordinate with the California Independent System Operator to obtain all necessary line clearances prior to removing or installing conductors to ensure that the existing power lines can be taken out of service and that power could be redistributed to service centers and customers. SDG&E would coordinate line outages to maintain system reliability and construction personnel safety. Based on preliminary engineering, SDG&E does not anticipate any project-based interruption of service to customers during construction.

Conductor removal would begin with the installation of travelers or “rollers” on the bottom of each of the existing insulators using helicopters or aerial manlifts (i.e., bucket trucks). The travelers would allow the conductor to be pulled through each pole until the existing line is removed. After the installation of the travelers, the old conductor would be pulled onto the travelers from pole to pole using helicopters or aerial manlifts traveling along the ROW. Once in place, the old conductor would be attached to a steel cable, pulled through the travelers using conventional tractor-trailer pulling equipment located at the stringing sites, and stored on conductor reels. Placement of temporary anchors may be required in order to stabilize pulling equipment. Alternatively, helicopters may employ specialized equipment for work in areas with limited access. Figure 4-16 depicts the typical conductor stringing process.

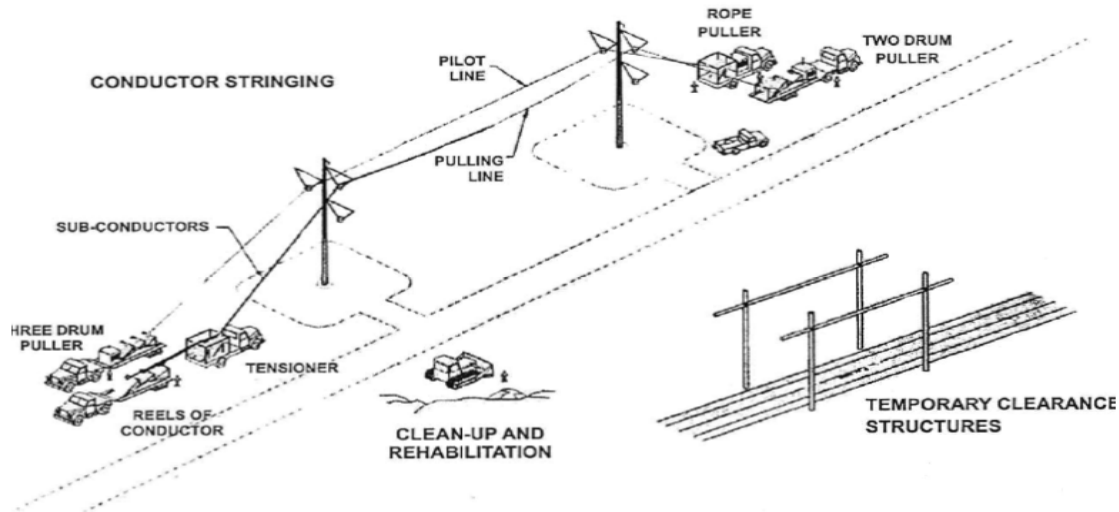


Figure 4-16 Typical Overhead Conductor Stringing Process

Source: SDG&E 2017

In some cases, sleeves or splices may be installed on power lines. This may occur in locations where the existing conductor has been repaired, was not long enough during installation, and was joined to another segment. In some instances, it may not be feasible to pull these splices through the travelers due to their size or integrity. In these instances, the spliced section may be lowered to the ground and the splice would be replaced. The replacement would involve removing the old splice, wrapping a repair sleeve around the outside of the conductor, and pressing it into place to protect the conductor.

Full-tension splices, or compression splices, would be used if conductors were too damaged for a repair sleeve. During full-tension splices, the two ends of the conductor would be connected with the use of heavy-duty vices. Alternatively, a small, engineered, implosive charge would be wrapped around a specially designed metallic sleeve, creating a controlled implosive compression that connects the two conductors.

Twenty-four designated stringing sites would be required in order to stage the required heavy equipment and collect the removed conductor onto reels for transport off site. Figure 4.2 depicts the locations of the proposed stringing sites. Each stringing site would require clearing approximately 0.1 acres of vegetation. As described previously, depending on topography, some incidental grading may be required at stringing sites to create level pads for equipment. In some locations (e.g., where short distribution spans would be transferred to the new poles or replaced), stringing would be done by hand. Hand-stringing would be conducted within the previously identified pole work areas.

4.7.2 Existing Facilities Removal/Modification

The proposed project would involve removal or topping of certain existing power line poles. Once conductor is removed, SDG&E would remove—or “top”—existing poles as described in below.

Wood Pole Removal

The Proponent’s Environmental Assessment originally considered the use of a Hughes 500 or similar model helicopter to facilitate the removal of poles by air for a number of pole locations in sensitive areas (SDG&E 2017). This description includes two methods for removing existing poles. The first method entails the use of a single helicopter and crew; the alternate method would entail the use of two helicopters working in tandem at the same removal site. The applicant or its contractors would determine which of these methods to employ in the field based on a consideration of site and environmental conditions (e.g., weather, access, presence of environmental resources); pole integrity and availability of equipment at the time of the scheduled activity. Single craft pole removal would occur according to the following process.

The helicopter would approach the lagoon or cliff area and hover next to the pole designated for removal. A lineman, strapped in with feet on the helicopter skid, would lean out of the craft and unclip conductors from the insulators. The helicopter would descend to near ground level and drop a construction crew equipped with a chainsaw in the “helicopter drop zone” near the affected pole. Construction personnel would fell the pole as a single piece if feasible, though sometimes multiple cuts may be required. The helicopter would then hover over the drop zone personnel and lower a sling/collar. Construction personnel would attach the collar to the pole or pole segments, which would then be lifted to a safe altitude and flown out of the work area and back to a fly yard where poles would be collected and off-hauled for disposal.

Alternately, two helicopters could be used, in the following manner, to remove poles without the need to first fell them. This alternative entails the use of a Kaman K-MAX or similar model helicopter in conjunction with the Hughes 500 model to remove the poles. Because a Kaman K-MAX is a single occupancy helicopter, the previously identified Hughes 500 model would be used to assist in the process as described below.

A Hughes 500 (or similar) helicopter would hover next to the pole identified for removal, and a lineman, standing on the helicopter skid, would unclip the conductors from the insulators. The same helicopter would drop construction personnel equipped with a chainsaw in the helicopter drop zone near adjacent the pole. The construction crewmember would climb the pole and await the other helicopter to approach with a collar/sling that would be lowered to the crewmember. The crewmember would attach the lifting sling to the pole and lower herself down and off the pole. The K-MAX helicopter, attached to the pole with the collar, would lift and hover above the pole until the connecting line is taught. Construction personnel would then use the chainsaw to cut the pole near its base, and the helicopter, with the entire cut section attached, would lift to a safe altitude and transport the pole (segment) out of and away from the worksite, back to the fly yard, where poles would be collected and later off-hauled for disposal.

Where complete pole removal is not practical (e.g., if the pole cannot be removed from the ground or doing so could affect sensitive plant or aquatic species), poles would be cut into one or more sections to a depth of 6 to 24 inches below grade. The pole's base would be abandoned in place and the void backfilled and compacted with native soil. In some locations, the poles may be cut off near ground level to avoid impacts to sensitive resources or private property. All associated anchors and stub poles would be removed. Old poles, associated hardware, and any other debris generated from project activities would be removed from project sites and recycled or disposed of properly at an approved facility.

Pole Topping

As described previously, power line poles that contain a distribution circuit in the under-build position would be topped approximately 1 foot above the distribution circuit. Pole-topping work would begin with the removal of the existing hardware, as described previously. A crewmember would then climb each pole and cut it approximately 1 foot above the distribution infrastructure. Wood poles would be cut with a chain saw and steel poles with a mechanical saw, and a new top cover plate would be welded to the top of the pole. Pole-tops would then be removed and transported to an approved facility for recycling or disposal. Boom/bucket trucks would be used for pole topping in areas that can be accessed by ground-based vehicles traveling on existing developed areas, paved roads, or access roads. Helicopters would be used where vehicular access is not available.

4.7.3 Underground Power Line Construction

The typical underground power line construction process is described in the subsections that follow and is depicted in Figure 4-17.

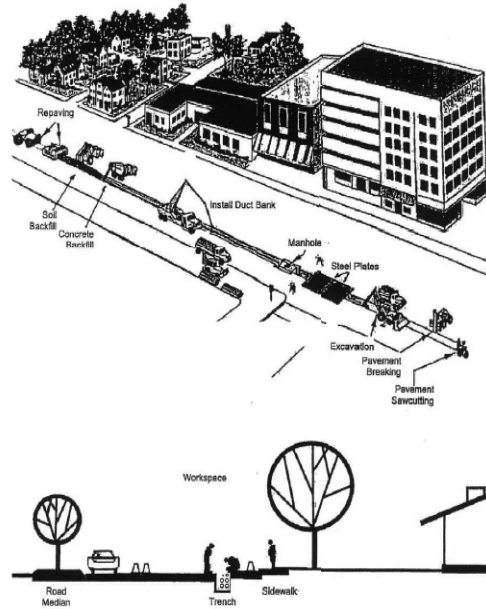


Figure 4-17 Typical Underground Construction Process within Roadways

Source: SDG&E 2017

Trenching

SDG&E would conduct exploratory excavations (i.e., potholing) to verify locations of existing facilities marked out in the field prior to excavation. SDG&E would use open-cut trenching techniques to install duct banks. Figures 4-7 and 4-12 illustrate the typical duct banks. Typical trench dimensions for the installation of a duct bank are 6 to 9 feet deep and 24 to 30 inches wide, depending on the circuit voltage class. The excavation may expand in width to accommodate a flat configuration, if required. Depth may also vary depending on soil stability and the presence of existing facilities. The trench would be widened and shored where necessary to meet California Occupational Safety and Health Administration safety requirements.

Concrete saw-cutting slurry produced during trenching would be cleaned from the street and not allowed to reach the curb or storm drain inlet. If trench water were encountered, trenches would be dewatered using a portable pump and disposed of in accordance with acquired permits.

Trenching operations would be staged in intervals so that only approximately 300 to 500 feet of trench would be left open at any one time or as allowed by permit requirements. This would generate 200 to 333 cubic yards of excavated material per day. At any one time, open trench length would not exceed that required to facilitate the installation of the duct banks. Steel plating would cover open trenches, where appropriate, to maintain vehicular and pedestrian traffic across areas that are not under active construction. Traffic controls would also be implemented to direct local traffic safely around work areas, as stipulated by required individual encroachment permits. SDG&E would coordinate provisions for

emergency vehicle and local access with local jurisdictions, as necessary, as discussed further in Section 5.16, "Transportation and Traffic."

Throughout trench excavation, asphalt, concrete, and excavated materials would be transported off site for disposal. All non-hazardous materials would be transported to a landfill. Should hazardous materials be found, SDG&E would transport these materials to an appropriately permitted and approved disposal facility. Excavated materials would be tested and may be used as backfill if the material is deemed geotechnical suitable. Testing is not required if the soil is used as backfill for the trench where it was excavated. In the locations where existing concrete would be removed to facilitate trenching activities, concrete saws and other pavement-breaking machines would be used. If equipment is unable to access required removal areas, jackhammers would be used on an as-needed basis to break up concrete.

Should contaminated soil be encountered during trenching activities, SDG&E would sample in place, test, profile, and transport this material to an appropriately permitted disposal facility in accordance with all federal, state, and local laws and regulations. The number of truck trips to transport excavated materials to storage yards and/or disposal facilities would vary based on the rate of the trenching, the area excavated to install the vaults, and the proximity of the storage yards/disposal facilities to the ROW. It is anticipated that approximately 15 to 20 truck trips per day would be required during trenching activities at one site. Other miscellaneous equipment may include a concrete saw, backhoe, excavator, roller compactor, water truck, various paving equipment, and standard 1-ton pickup trucks.

Duct Bank Installation

As each section of the trench for the underground duct banks is completed, cable conduits (separated by spacers) would be installed and concrete would be poured around the conduits to form the duct bank encasement. Ducts would typically consist of 5- to 6-inch-diameter PVC conduits, which would house the electrical cables, and 4-inch-diameter PVC conduits for the telecommunications cable used for system protection and communication. Duct banks would be approximately 3 feet wide by 3 feet high, and they would be located in the trench at a minimum depth of 3 feet from top of the encasement to the surface.

Once PVC conduits are installed and encased, engineered backfill or excavated native soil would be imported, placed, and compacted. Each duct bank would have a minimum of 36 inches of cover. A road base backfill or slurry concrete cap would be installed to restore the road in compliance with local requirements. As discussed previously, all non-hazardous soil and grub material that is transported off site may be disposed of at Miramar Landfill, Sycamore Landfill, or Otay Landfill, and material found to contain hazardous substances would be disposed of at an approved facility. While the completed trench sections are being restored, additional trench would be opened farther down the alignment. This process would continue until the entire duct bank is in place.

Where the duct banks cross or run parallel to other substructures that operate at normal soil temperature (e.g., gas lines, telephone lines, and water mains), a minimum radial clearance of 12 to 24 inches would be required. Where the duct banks cross or run parallel to other substructures with operating temperatures that significantly exceed the earth's temperature (e.g., other underground transmission circuits, primary distribution cables, steam lines, and heated oil lines), an increased radial clearance may be required. Clearances and depths would meet requirements set forth in Rule 33.4 of CPUC G.O. 128.

Vault/Hand Hole Installation

To facilitate the pulling and splicing of the underground cables, vaults would be installed in line with the 69-kV duct banks, and hand holes would be installed in line with the 12-kV duct banks. During operation, these structures would provide access to the underground cables for maintenance inspections, repairs, and replacement, if needed. During the trenching, trenches would be widened at underground vault and hand hole locations. The pre-formed, steel-reinforced, pre-cast concrete splice vaults and hand holes would be delivered to the work site on flatbed trucks and would be lowered into place using cranes, then connected to the underground duct banks before being covered with the appropriate level of compacted fill. The surface above the vaults and hand holes would be repaved or restored as appropriate.

Cable Pulling, Splicing, and Termination

After installation of conduit and splicing vaults, cables would be installed in the duct banks. Each cable segment would be pulled into the duct bank, spliced at each of the vaults/hand holes along the route, and terminated at a transition area. To pull the cable through the ducts, a cable reel would be placed at one end of the section and a pulling rig at the other end. A large rope would then be pulled into the duct using a fish line, and attached to the cable pulling eyes. The cable pulling eyes would then be attached to the conductor, and the cable pulled through the duct. A lubricant would be applied to the cable as it enters the duct to decrease friction during pulling.

Electric cables would be pulled through the individual ducts at the rate of approximately two to three segments between vaults/hand holes per day. A splice trailer would be positioned adjacent to the vault/hand hole openings to facilitate cable splicing after the cables are pulled through the ducts. Each splice would require approximately three working days to complete.

4.7.4 Circuit Breaker Removal and Replacement

While the actual number and type of equipment and vehicles required for the proposed circuit breaker removal and replacement would vary depending on the construction activities occurring each day, the common types anticipated for the work are presented in Table 4-4. It is anticipated that a forklift would be used to remove the existing circuit breaker and place the new breaker into position. The forklift would operate within the fenced portion of the substation during replacement work. Nighttime work is not anticipated during this phase of the proposed project. Anticipated work hours would be consistent with the remainder of the proposed project and, unless dictated otherwise by permit conditions, would comply with applicable local noise ordinances regarding nighttime noise levels

The circuit breaker and associated hardware would be removed from the substation site and then taken to an existing SDG&E yard. If possible, parts would be separated to serve as emergency replacement parts for other equipment currently in service. The remaining parts would be brought to a local contracted middle scrap company for disposal. SDG&E's best management practices would be implemented as applicable during this process.

4.7.4 4.7.5 Cleanup and Post-Construction Restoration

Removed wood poles would be re-used, recycled, or disposed of at an approved facility. Non-reusable treated wood would be disposed of in a composite-lined portion of a municipal solid waste landfill

approved by the Regional Water Quality Control Board. In San Diego County, the Otay Landfill is currently the only composite-lined landfill that would accept utility poles and treated wood. This facility is located approximately 35 miles south of the project vicinity in the city of Chula Vista.

SDG&E would restore all areas that are temporarily disturbed by project activities (e.g., stringing sites, pole work areas, and staging areas) to near pre-construction conditions and as consistent with fire break requirements. Restoration could include reseeding; planting replacement vegetation; restoring removed curbs, gutters, and sidewalks; repaving all removed or damaged paved surfaces; or replacing structures (e.g., fences), as appropriate. In addition, all construction materials and debris would be removed from the project work areas and recycled or properly disposed of off-site. SDG&E would conduct a final survey to ensure that cleanup activities are successfully completed as required.

4.8 Construction Schedule

SDG&E anticipates project construction to be complete within 12 months, beginning in 2019 with below-grade construction at the Del Mar Substation. The new pole and underground duct bank installation for TL674A is anticipated to occur within approximately four months. Once TL674A is reconfigured, SDG&E would begin work on removal of TL666D. It is anticipated that C510 and C738 would be relocated in parallel with the proposed TL674A Reconfiguration. The circuit breaker replacement process would be initiated after the TL674A Reconfiguration is complete. As a result, it would overlap with the TL666D Removal, C510 Conversion, and C738 Conversion. Construction work is anticipated to occur during normal work hours from Monday through Saturday pending jurisdictional requirements. A detailed construction schedule is included in Table 4-8.

Table 4-8 Construction Schedule by Activity, Duration and Project Component

Project Component, Activity	Duration (months)	Number of Crew
TL674A Reconfiguration		
Duct Bank and Vault Installation	4.0	20
Foundation Installation	3.5	7
Underground Cable Installation	2.0	13
Pole Installation	2.0	5
Reconfigure Tap	0.25	8
Component Duration	4 months (approx.)	
TL666D Removal		
General Construction	N/A	N/A
Conductor Removal	1.0	12
Pole Removal	1.5	5
Component Duration	2 months (approx.)	
C510 Conversion		
Duct Bank and Hand Hole Installation	1.0	12
Foundation Installation	1.5	5
Pole Installation and Removal	N/A	N/A
Conductor, Cable Installation and Removal	1.0	12
Component Duration	3.5 months (approx.)	
C738 Conversion		
Duct Bank and Hand Hole Installation	1.0	20
Foundation Installation	1.0	5
Pole Installation and Removal	1.0	5
Conductor, Cable Installation and Removal	1.0	12

Table 4-8 Construction Schedule by Activity, Duration and Project Component

Project Component, Activity	Duration (months)	Number of Crew
Circuit Breaker Removal and Replacement		
Below-grade construction (circuit breaker removal, foundation system, conduit from TL673)	1.75	N/A
Above-grade construction (circuit breaker installation)	2.0	N/A
Component Duration	4 months (approx.)	

Key:

N/A = not applicable

4.9 Operation and Maintenance

As part of the TL674A reconfiguration, SDG&E proposes to install approximately 1.1 miles of new underground duct bank and two new 69-kV poles. SDG&E currently operates and maintains TL610 and TL667, which are installed parallel to the proposed underground duct banks within Via De La Valle. In addition, two new 69-kV poles would be installed within an established power line corridor, meaning that any O&M activities that would be necessary to service the proposed project are represented by those already conducted on overhead and underground 69-kV power lines in the area. The TL666D removal would eliminate all future O&M activities associated with this line. SDG&E would maintain and operate poles topped to allow for existing overhead distribution conductors to operate in the same manner as under existing conditions (prior to implementation of the proposed project).

Conversion of C510 would eliminate the O&M requirements associated with approximately 3,900 feet of existing overhead distribution line. The riser poles that would be installed adjacent to existing poles would be removed and avoid new O&M requirements in these locations. The approximately 3,600 feet of new underground duct bank that would operate in areas where SDG&E services other existing distribution facilities would not represent a net new source of electrical energy or increase in energy capacity.

Following completion of the proposed project, SDG&E would establish service to the new and converted lines. Thereafter, SDG&E would inspect, maintain, and repair power lines as necessary and in accordance with established practice and state law as required. O&M activities would involve both routine preventive maintenance and emergency procedures to maintain service continuity. SDG&E would perform aerial and ground inspections of proposed project facilities; aboveground components would be inspected annually (at a minimum) for corrosion, equipment misalignment, loose fittings, and other common mechanical problems.

4.10 Project Design Features and Ordinary Construction Restrictions

SDG&E would incorporate a number of project design features and ordinary construction restrictions into all phases of the proposed project as applicable, and include actions and activities to:

- Control and suppress fugitive dust during construction work (see Section 5.3, “Air Quality”);
- Secure bulk materials during transport to and from staging areas (see Section 5.3, “Air Quality”);

- Minimize emissions from vehicles during loading and unloading and exhaust from heavy machinery used in construction activities to avoid emissions peaks (see Section 5.3, “Air Quality”);
- Reduce volatile organic compounds (VOCs) by using low- and non-VOC-containing coatings, sealants, adhesives, solvents, asphalt, and architectural coatings (see Section 5.3, “Air Quality”);
- Train, identify, alert, and, if necessary, stop work if monitoring construction activities results in identification of archeological or cultural artifacts that may be discovered during excavation and other soils-moving activities (see Section 5.5, “Cultural Resources”); and
- Work within established and permitted hours of construction to ensure that construction-related noise conforms to local noise standards and to address the possibility that the applicant would seek to either work beyond the times of day normally allowed for construction, or temporarily relocate sensitive receptors exposed to noise levels above thresholds stipulated and conditioned by relevant local noise ordinances and permit conditions (see Section 5.12, “Noise”).

The relevant project design features and related requirements to address the proposed project’s air quality, transportation, hazardous materials, cultural resources, and construction noise effects are discussed in the sections noted above.

4.11 Applicant Proposed Measures

SDG&E included applicant-proposed measures (APMs) in its June 2017 PEA, as listed in Table 4-9, Applicant Proposed Measures (SDG&E 2017). SDG&E proposes to implement APMs as part of project construction or operation as applicable, as a way to reduce or avoid environmental impacts.

Table 4-9 Applicant Proposed Measures

Topic and Measure	Description
Biological Resources	
APM BIO-01	During the appropriate phenological (i.e., blooming) periods, pre-construction surveys for special-status plants (specifically, federally listed, state-listed, and California Rare Plant Rank 1 and 2 plants) would be conducted within one year prior to the start of construction in areas that have the potential for special-status plants to occur. A hand-held Global Positioning System unit with submeter accuracy would be used to record the locations of special-status plant occurrences. Prior to construction, any occurrences of special-status plants that SDG&E determines to be avoidable will be marked with fencing or flagging, for avoidance during construction activities. Where disturbance to these areas cannot be avoided, SDG&E would restore temporarily impacted areas, as described in APM-BIO-05.
APM BIO-02	Biological monitors would be present during all activities within special-status species habitat and sensitive natural communities. The biological monitors would conduct a pre-construction clearance survey of the work area and would verify that activities comply with the Project APMs and SDG&E’s Subregional NCCP Operational Protocols.
APM BIO-03	To minimize the spread of noxious and invasive weeds during construction, SDG&E would ensure that construction vehicles arrive to work sites clean and weed-free prior to entering the ROW in cross-country areas, ensure straw wattles (non-plastic) used to contain storm water runoff are weed-free, and document the extent of noxious weeds within the construction areas prior to construction. Noxious weeds are defined as species rated as High on the California Invasive Plant Inventory Database, published by the California Integrated Pest Council.

Table 4-9 Applicant Proposed Measures

Topic and Measure	Description
APM BIO-04	Impacts to oak trees, Torrey pines, and other native trees will be avoided and/or minimized to the extent possible during construction. In the event that any native trees are required to be removed, SDG&E will comply with all applicable City of San Diego and/or City of Del Mar requirements for tree preservation and mitigation.
APM BIO-05	All areas disturbed as a result of construction activities will be re-contoured and restored to the original conditions to the extent feasible including using soil salvaging and special-status plant protections as described in SDG&E's Habitat Enhancement Measures. These areas will be allowed to revegetate naturally.
APM BIO-06	<p>A Nesting Bird Management Plan will be prepared to outline procedures for minimizing impacts to nesting birds protected by the Migratory Bird Treaty Act during construction. The plan will address how to avoid direct or indirect impacts to nesting birds through various measures, including:</p> <ul style="list-style-type: none"> • conducting pre-construction nesting bird surveys during specified breeding times within a certain distance of the construction areas; • establishing avoidance and minimization buffers for active nests based on species-specific noise tolerances; • describing construction activities that can occur within avoidance and minimization buffers; • implementing procedures for reducing buffers as appropriate; and • monitoring protocols to document compliance with the Nesting Bird Management Plan, including daily nesting bird reports, during construction. <p>The Nesting Bird Management Plan will be implemented during construction for all potentially affected bird species.</p>
APM BIO-07	If a special-status wildlife species is identified on site during construction, crews will temporarily stop work in the immediate vicinity of the animal and immediately contact the biological monitor or designated SDG&E representative. Work will not proceed until the animal has moved out of harm's way on its own or has been relocated by a qualified biologist.
APM BIO-08	Nighttime construction lighting in suitable habitat for special-status wildlife and nesting birds will be minimized to the extent feasible. Exterior lighting within and adjacent to potential special-status wildlife habitats will utilize the lowest illumination allowed for human safety and will be selectively placed, shielded, and directed away from suitable special-status species habitat, to the maximum extent practicable.
APM BIO-09	Prior to construction, a habitat survey for potential bat roosts that may be impacted by construction activities will be conducted. During the survey, potential roost sites will be searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. Up to two weeks prior to construction, a qualified biologist will conduct bat surveys at roost sites identified as potentially active from signs of bat use identified during the survey. If bats are detected, SDG&E will avoid conducting construction activities that may directly impact the active roost site. If an active maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31).
APM BIO-10	To the maximum extent feasible, construction vehicles and equipment will be refueled, maintained, and repaired at least 100 feet away from a wetland or water feature. If refueling, maintaining, or repairing equipment and vehicles in or within close proximity to wetlands is unavoidable, appropriate secondary spill containment will be used to prevent spills in sensitive habitats.

Table 4-9 Applicant Proposed Measures

Topic and Measure	Description
Geology and Soils	
APM GEO-1	SDG&E will consider the recommendations and findings of a final geotechnical investigation and the contractor's Geotechnical Engineer regarding the potential for seismic activity, landslides, expansive soils, slope instability and differential settling. SDG&E will incorporate those recommendations, as appropriate, into the final design of the proposed project. The final proposed project design will be reviewed and approved by a Professional Engineer registered in the State of California prior to construction.
Public Services	
APM PS-01	<p>No less than 60 days prior to beginning construction, SDG&E will coordinate with schools (or the appropriate school district) that are located within 250 feet of proposed project activities. These schools include the following:</p> <ul style="list-style-type: none"> • Therapeutic Learning Center • Del Mar Hills Elementary School • Del Mar Hills Nursery School • Brighter Future Preschool and Child Development Center • Del Mar Heights Elementary School <p>SDG&E and the schools (or school district) will determine the best time to conduct construction activities that have the potential to impact schools in an effort to avoid major school events and to minimize any disruption to learning. Where feasible, SDG&E will conduct construction activities outside of the scheduled school year, during seasonal breaks, outside of peak drop-off and pick-up hours for the standard school day, at night, or during weekends to reduce potential impacts to local schools.</p>
Recreation	
APM REC-01	SDG&E will post signage at access points to recreational facilities that may be subject to access restrictions due to the proposed project no less than four weeks prior to the beginning of construction activities within or adjacent to the facilities. These facilities will include Torrey Pines State Natural Reserve, Torrey Pines State Beach, Del Mar Horsepark, and Sorrento Valley Pedestrian/Multi-Use Path. This signage will notify users of the impending construction activities; construction impacts (e.g., increased noise and dust); the affected locations; and the estimated duration of any necessary temporary closures or access restrictions. Contact information for the proposed project's public liaison will be provided on the signage, and the public liaison will address any complaints related to dust, noise, and access restrictions.
APM REC-02 (<u>Revised by SDG&E in response to Data Request 01 by the CPUC [SDG&E 2017c]</u>)	Authorities for recreational facilities that may be subject to access restrictions (i.e., the California Department of Parks and Recreation and the City of San Diego) will be directly contacted and given advance notice of proposed project activities no less than four <u>eight</u> weeks prior to construction. SDG&E will also coordinate with the 22nd District Agricultural Association that manages and operates the Del Mar Horsepark at least four <u>eight</u> weeks prior to construction to minimize potential impacts to the facility and its users during construction.
Transportation	
APM TRA-01	At least 30 days prior to construction of the proposed project, SDG&E will coordinate with the Del Mar Fire Department and the San Diego County Sheriff's Department to inform them of the planned lane closures along Jimmy Durante Boulevard and to minimize potential disruptions to emergency vehicle response times.

Table 4-9 Applicant Proposed Measures

Topic and Measure	Description
APM TRA-02	At least 30 days prior to construction, SDG&E will coordinate with the North County Transit District on the planned construction activities, including the timing and duration of construction in the vicinity of existing bus stops along Via De La Valle. This coordination will include the identification of potential temporary relocation of bus stops in order to maintain service during construction. At least 10 days prior to the bus stop closure, SDG&E will post signs near any affected bus stops to notify bus riders of any potential modifications the standard bus schedule, alternate stops in the area, and a phone number to call to obtain more information.

Source: SDG&E 2017.

4.12 Electric and Magnetic Fields Summary

Background

On January 15, 1991, the CPUC initiated an investigation to consider its role in mitigating the health effects, if any, of electric and magnetic fields (EMF) from utility facilities and power lines. A working group of interested parties, called the California EMF Consensus Group, was created by the CPUC to advise it on this issue. It consisted of 17 stakeholders representing citizens groups, consumer groups, environmental groups, state agencies, unions, and utilities. The Consensus Group was charged to 1) consider a balanced set of facts and concerns; 2) define near-term research objectives; and 3) develop interim policies and procedures to guide the electric utilities in educating their customers, reducing electric and magnetic fields, and responding to potential health concerns. The Consensus Group's fact-finding process was open to the public, and its report incorporated concerns expressed by the public. Its recommendations were filed with the CPUC in March of 1992. In August of 2004, the CPUC opened an Order Instituting Rulemaking to update the CPUC's policies and procedures related to electric and magnetic fields emanating from regulated utility facilities. The final decision was issued in 2006 (D.06-01-042).

Magnetic Fields Design Guidelines

The California Public Utilities Commission (CPUC) requires SDG&E to apply its *EMF Design Guidelines for Electrical Facilities* ("Guidelines") to all new and upgraded electric power and transmission projects to reduce public exposure to magnetic fields. SDG&E filed its Guidelines with the CPUC in accordance with CPUC Decision 93-11-013 and updated them in accordance with the 2006 CPUC Decision 06-01-042.

Consistent with SDG&E's Guidelines and with the CPUC order, magnetic fields and possible magnetic field management measures were evaluated along the power line locations associated with the proposed project. Moreover, reducing the magnetic field strength is but one of many factors to be considered in planning and designing a transmission system, along with other issues such as safety, environmental concerns, reliability, insulation and electrical clearance requirements, aesthetics, cost, operations and maintenance.

The scope of magnetic field analysis conducted by the applicant does not include the distribution lines, per SDG&E's Guidelines, which state: "For distribution facilities, utilities would apply no-cost and low-cost measures by integrating reduction measures into construction and design standards, rather than

evaluating no-cost and low-cost measures for each project.” Thus, for purposes of this description, the term “Project” includes only the 69-kV lines TL666D, TL674A and TL6973.

Magnetic Fields Management Methodology

In Decision 06-01-042, the CPUC noted “Utility modeling methodology is intended to compare differences between alternative EMF mitigation measures and not determine actual EMF amounts.”² The CPUC also noted that “modeling indicates relative differences in magnetic field reductions between different transmission line construction methods but does not measure actual environmental magnetic fields.” In accordance with its Guidelines, SDG&E considered the following measures for the proposed project:

- Apply its EMF Guidelines to the proposed project design.
- Identify and implement appropriate “no-cost” measures, i.e., those that will not increase overall project costs but will reduce the magnetic field levels.
- Identify and implement appropriate “low-cost” measures, i.e., those measures costing in the range of 4 percent of the total budgeted project cost that will reduce the magnetic field levels by 15 percent or more at the edge of the right-of-way (ROW).
- When a sufficiency of “low-cost” measures is available to reduce magnetic field levels, such that it is difficult to stay within the 4 percent cost guideline, apply these “low-cost” measures by priority of adjacent land uses.

The 15 percent minimum reduction required for low-cost measures is in addition to any field reduction due to “no-cost” measures. It is not cumulative. Since the proposed project requires permitting under General Order 131-D, a Detailed Field Management Plan (FMP) was developed by SDG&E. The FMP consists of a project description, a checklist table showing evaluation of magnetic field reduction measures adopted or rejected, and a summary with recommendations.

For EMF modeling purposes, the areas where power lines are being removed were not modeled since removing the lines drastically reduces EMF fields in the surrounding areas. The segment that was modeled was the new underground 69-kV powerline running parallel to Via de la Valle (TL6973).

Checklist Magnetic Field Management Plan for the Del Mar Substation

Generally, magnetic field values along the substation perimeter are low compared to the substation interior because of the distance to the energized equipment. Normally, the highest values of magnetic fields around the perimeter of a substation are caused by overhead power lines and underground duct banks entering and leaving the substation, and not by substation equipment. Therefore, the magnetic field reduction measures generally applicable to a substation project are as follows:

- Site selection for a new substation;

² CPUC Decision D.06-01-042, Finding of Fact 14, p. 20

- Setback of substation structures and major substation equipment (such as bus, transformers, and underground cable duct banks, etc.) from perimeter;
- Field reduction for transmission lines entering and exiting the substation

The Substation Checklist used by SDG&E evaluated the no-cost and low-cost measures considered for the substation project, the measures adopted, and reasons that certain measures were not adopted.

No-cost and low-cost steps to reduce EMF

In response to a situation of scientific uncertainty and public concern, the CPUC felt it appropriate for utilities to take no-cost and low-cost measures where feasible to reduce exposure from new or upgraded utility facilities. It directs that no-cost mitigation measures be undertaken, and that low-cost options be implemented through the project certification process. Four percent of total project budgeted cost is the benchmark in developing EMF mitigation guidelines, and mitigation measures should achieve some noticeable reductions. The CPUC will continue to monitor these issues. If new information develops in the future, the CPUC may amend its decision to reflect new scientific evidence.

Exemption Criteria

The CPUC agreed that “Utility management should have reasonable latitude to deviate and modify their guidelines as conditions warrant and as new EMF information is received. However, if the EMF guidelines are to be truly used as guidelines, the utilities should incorporate criteria which justify exempting specific types of projects from the guidelines.” Utilities may use the following guidelines to determine those specific types of projects that will be exempt from no/low cost field reduction:

1. Operation, repair, maintenance replacement or minor alteration of existing structures: facilities or equipment.
2. Restoration or rehabilitation of deteriorated or damaged structures, facilities or equipment to meet current standards of public safety.
3. Addition of safety devices.
4. Replacement or reconstruction of existing structures and facilities on the same site and for the same purpose as the replaced structure or facility.
5. Emergency restoration projects.
6. Re-conductoring projects except when structures are reframed or reconfigured.
7. Projects located on land under the jurisdiction of the Forest Service, Bureau of Land Management or other governmental agency.
8. Privately owned tree farms.
9. Agricultural land within the Williamson Act.
10. Areas not suited to residential/commercial development. Such areas might include steep slopes, areas subject to flooding or areas without access to public facilities.

The intent of the exemption criteria is to exclude two types of projects. The first type of projects are those that either replace or make minor additions or modifications to existing facilities. This will include pole

replacements or relocations less than 2,000 feet in length. Those projects where more than 2,000 feet of line is relocated or reconstructed or where the circuit is reinsulated or reconfigured should be considered for low cost magnetic field management techniques. The second type projects are those located in undeveloped areas.

Magnetic Field Reduction Measures Considered for the Project

Per SDG&E's Guidelines, all portions of power lines within the scope of the proposed project were reviewed for suitable application of magnetic field reduction measures. Table 4-10 summarizes the measures considered for the proposed project.

Table 4-10 Magnetic Field Reduction Measures Adopted or Rejected

Component	Adjacent Land Use	Reduction Measure Considered	Measure Adopted? (Yes/No)	Estimated Cost to Adopt
TL6973	Commercial/industrial, limited residential	Phase circuits to reduce magnetic fields	No	No-Cost
	Reason(s) if not adopted: This single power line installation does not allow arrangement of phasing to achieve cancellation with the phasing of another line. Therefore, this option was rejected.			
TL6973	Commercial/industrial, limited residential	Locate power lines closer to center of the utility corridor to extent possible	No	No-Cost
	Reason(s) if not adopted: The preliminary design of the underground trench was developed to not conflict with the existing utilities along Via De La Valle. Therefore, this option was rejected.			
TL6973	Commercial/industrial, limited residential	Increase trench depth	No	Low-Cost
	Reason(s) if not adopted: The required increased depth to reach a 15% reduction would require a depth greater than 8 feet and would degrade the capacity, not allowing the needed 102 MVA rating.			

Key:
MVA = megavolt ampere

Utilities must use the following Guidelines in the application of no and low-cost steps to reduce magnetic field strengths:

1. Take low cost steps to reduce fields from new and upgraded facilities in accordance with CPUC decision D.06-01-042 on EMF.
2. No cost measures will be implemented when available and practical.
3. Mitigation measures should not compromise the reliability, operation, safety or maintenance of the system.
4. Total cost of mitigation measures should not exceed 4 percent of the total cost of the project.
5. Mitigation measures should have a noticeable reduction in the magnetic field level approximately 15 percent or more.

References

Digital Globe. 2016. Georeferenced Project Overview and Components on Aerographical Map for the TL674A Reconfiguration & TL666D Removal Project.

Esri. 2018. Georeferenced Project Location and Components on Aerographical Map for the TL674A Reconfiguration & TL666D Removal Project.

San Diego Gas & Electric (SDG&E). June 2017. Proponent's Environmental Assessment for the TL674A Reconfiguration & TL666D Removal Project.

San Diego Gas & Electric (SDG&E). 2018. Georeferenced Project Location and Components on Aerographical Map for the TL674A Reconfiguration & TL666D Removal Project.

5.0 Environmental Setting and Impacts

5.1 Aesthetics

5.1.1 Environmental Setting

Technical Terminology

Technical terms used in the evaluation of the proposed project's effects on aesthetics and visual quality are derived from visual resource management systems developed by the Bureau of Land Management (BLM 1984), the Federal Highway Administration (FHWA 1988, 2015), and the National Park Service (NPS 2014). General concepts pertaining to the description and organization of visual objects in the environment are also taken from *The Image of the City* (Lynch 1960).¹

- *Viewshed* refers to the geographical area visible from a viewer's location and includes the visual setting within which project infrastructure is visible. It includes all surrounding points that are in line-of-sight with that location and excludes points that are beyond the horizon or obstructed by terrain and other features (e.g., buildings, trees). Within a viewshed, *fore-*, *mid-*, and *background* describe the spatial position of visible features from the viewer's perspective.
- *Fore-, Mid-, Background: Foreground* refers to the visual elements located closest to the viewer in the visible area of a landscape. *Background* describes the relative position of elements in a view that lie beyond those in the fore- or mid-ground and appear furthest from the viewer. *Mid-ground* denotes the visible area of a landscape somewhere between the foreground and background.
- *Visual contrast* refers to how changes in the environment may be perceived by a viewer. *Contrast* refers to an object's form in relation to other objects or surrounding space; *line* is a real or imagined path the eye follows between an origin and endpoint; *color* is the hue and value of an object; and *texture* is perceived coarseness of a surface created by the relationship of light and shadow from an object's surface. The proposed project's potential aesthetic changes are evaluated by gauging the magnitude of visual contrast between a baseline (existing) condition and one that would occur under proposed project conditions. The degree of visual contrast is used to determine whether the proposed project's effects on aesthetic resources would be "substantial and adverse."
- *Key observation points (KOPs)* refer to publicly accessible places that are fixed points in the environment from which a viewer may observe a composition of physical features that represent a view from that particular point. KOPs selected for this Initial Study are those where views of infrastructure associated with the proposed project (poles, power lines, etc.) are visible (as an existing condition) or would be visible (under project conditions). KOPs are located at publicly accessible spaces because evaluations of a project's aesthetic effects consider public views and

¹ *The Image of the City* is a book based on a multi-year study of Boston, Jersey City, and Los Angeles to investigate the manner in which city dwellers view, perceive, and navigate cities. The study uses terminology that describes interrelated parts of the physical (visual) environment such as *nodes* (points of congregation), *landmarks* (visual anchors), *districts* (distinct urban places), *edges* (physical barriers between districts), and *paths* (streets and other transit routes) that may also be included in the analysis of the proposed project's aesthetic effects.

scenic vistas as defined in local planning documents. KOPs may also represent similar views that would be available from nearby private viewpoints, though changes in visual quality or to scenic views from private viewpoints are not considered in the significance determination of aesthetic impacts because changes to views from private property are outside the scope of environmental review.

- *Visual simulations or photomontages* refer to computer-simulated images of proposed project features that are rendered and inlayed in a photo-realistic depiction of the existing setting. Visual simulations are tools useful for depicting visual change. Views from selected KOPs are presented in this Initial Study in an “existing condition” that establishes a baseline view of the surrounding vicinity available from a given KOP. “Simulated views” from the same KOP facilitate comparison of visual conditions as they currently exist and as they could exist with proposed project features included in the view. This Initial Study includes six photomontages in the evaluation of the proposed project’s aesthetic effects.

Visual Character of the Project Area and Vicinity

As described in ~~Section~~ Chapter 4.0, “Project Description,” the proposed project entails the removal, installation, and modification of utility poles, tie lines, distribution lines, and other ancillary electrical infrastructure associated with TL674A, TL666D, C510, and C738 that would result in changes to the project area views and possibly the project area’s aesthetic character. Specifically, TL647A (a 69-kilovolt [kV] power line) would be reconfigured, extended to the Del Mar Substation, and renamed TL6973. Service to TL666D (also a 69-kV power line) would cease, and approximately 6 miles of existing overhead wiring would be removed between the existing Del Mar Substation and a riser pole located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive. Portions of two existing overhead 12-kV distribution lines would be relocated to conduit underground within the San Dieguito Lagoon (C510) and within the Sorrento Valley pedestrian/multi-use path (C738).

Within the project area, power lines are visible elements of the environment. Overhead power lines are strung from, and connect to, existing 65- to 85-foot-tall wooden or metal poles. The project area refers to locations where project construction, operation, and maintenance activities would occur, such as areas at the edges of city streets, adjacent Interstate 5 (I-5) as well as on public and private property, including land owned by San Diego Gas & Electric Company. Physical infrastructure, machinery and construction crews would be visible working in these spaces. Observers may notice crews installing or removing poles; stringing aerial power line between poles and underground; installing guard structures; moving, staging and storing vehicles, tools, and equipment; and on occasion, operating helicopters from nearby fly yards to remove poles from Los Peñasquitos Lagoon.

The project area’s visual setting is diverse and characterized by a variety of singular visual elements (e.g., homes, offices, roads, parking lots) that combine together in views to form recognizable visual patterns and landscapes (e.g., residential neighborhoods, hillsides, shopping centers, roadway intersections, open space, hillsides, beach, wetlands, etc.). Within the project area, natural areas abut urbanized lands where patches of green open space provide relief to the built environment and visually contrast with built-up areas and arid Southern California landscapes. The project area’s coastal topography varies from flat areas nearest the coast to more hilly locations inland. The hilltops along the coastal bluffs provide

panoramic views of the coast and ocean on the west and distant peaks and mountains in north- and southeasterly views.

The proposed project's existing electrical lines are visible from immediately adjacent residential neighborhoods (e.g., those near Racetrack View Drive, Mango Drive, and Portofino Drive); from public streets; from commercial areas and shopping centers; from adjacent public assembly and parking facilities, such as the Del Mar Fairgrounds, racetrack, and golf center; and within light industrial complexes and public utilities, as well as from intervening recreation and open space areas. Existing electrical poles and power lines follow city streets, flank commercial buildings, and create visual paths and delineated utility corridors through protected open spaces and canyons, including Crest Canyon, the Torrey Pines State Natural Reserve, the Torrey Pines State Natural Reserve Extension (Torrey Pines Extension), and the San Dieguito and Los Peñasquitos Lagoons.

Scenic Resources

The City of San Diego and the City of Del Mar's General Plans identify the Pacific Ocean, coastal bluffs and beaches, ridges and canyons, marshes and lagoons, mountains, parks and open spaces as scenic resources and important scenic areas within the proposed project vicinity:

- The **San Dieguito Lagoon and Floodway** is bounded on the north by the Del Mar Racetrack, Del Mar Fairgrounds, and expansive, hardscaped surface parking; on the south by clusters of light industrial businesses accessible from San Dieguito Drive; and on the east by I-5. The western half of the lagoon lies in the city of Del Mar, and the eastern portion in the city of San Diego. (City of Del Mar 2017) Jimmy Durante Boulevard visually delineates the lagoon from I-5 and residential neighborhoods to the west. Existing transmission facilities (TL666D) are visible within a wetland setting along the rural view corridor.
- The **San Dieguito River** and surrounding floodways and valley provide expansive views of grass, wetlands, and rolling hills that visually intermix with the built environment on its edges in the northwestern portion of the project area. Coastal sage scrub and various types of chaparral are visually prominent vegetation characteristic of the area's Mediterranean climate and semi-arid landscape.
- The **San Dieguito River Park** is also near the project corridor and is identified as a scenic resource in the Torrey Pines Community Plan. (City of San Diego 2014a) The park is located near San Andres Drive (south of Via De La Valle) along the river. TL674A is present just to the north of this park. Other transmission facilities (not part of the project) include those associated with TL667, TL610, TL23053, and TL23012 are also visible and transect the river approximately 0.5 miles east of the park's entrance.
- **Beaches, bluffs, and canyons** within the city of Del Mar are located to the west of Camino Del Mar and extend the length of the coast, where the Pacific Ocean, in views to the west, forms a visually prominent edge most evident from elevated vantage points. Existing transmission facilities (including portions of the TL666D at the northern end of Camino Del Mar) are visible elements in views of and from the hilltops in the Torrey Pines Extension, but do not extend far enough west to reach the coast.

- The **Torrey Pines Extension, Del Mar Scenic Trail, and North Torrey Pines Road** are located on hilltops approximately 200 feet above sea level. The Torrey Pines Extension is an open space area including over 180 acres of undeveloped land with high quality Torrey Pines woodland habitat (City of San Diego 2014). Westerly views from the Torrey Pines Extension are of the coast and the Pacific Ocean’s distant horizon. To the east, an expansive landscape of blocks and buildings crisscrossed by roads and occasional patches of green extend far into the distance. TL666D poles and overhead wiring are situated along the eastern side of the extension ridgeline that continue into the Los Peñasquitos Lagoon (City of San Diego 2014a). The Del Mar Scenic Trail offers hikers rustic hilltop views of the natural vegetation, undulating topography, and patchwork pattern of residential neighborhoods rising up toward the hilltops. The trail is approximately 0.2 miles west of the Del Mar Heights Elementary School, where a proposed fly yard would be located. Other nearby pedestrian access trails include the Del Mar Scenic Trail, the Margaret Fleming Natural Trail, and the Red Ridge Trail, which TL666D crosses.
- The **“northern open space buffer for Del Mar”** appears as occasional patches of green that punctuate bluffs and slopes near the San Dieguito Lagoon and Jimmy Durante Boulevard (City of Del Mar 2017). Existing transmission facilities, such as TL666D, as previously noted, are visible near the San Dieguito Lagoon and Jimmy Durante Boulevard. These areas generally correspond to those identified for “scenic protection” within the City of Del Mar General Plan (City of Del Mar 2017) and as “scenic areas and resources” described in the community plans contained within the City of San Diego General Plan. (City of San Diego 2007, 2014a, 2014b, 2014c)

Scenic Roadways

Several roadway segments have been identified within the City of San Diego and City of Del Mar General Plans as scenic. Within San Diego, these include North Torrey Pines Road between the ocean and Los Peñasquitos Lagoon, as well as Sorrento Valley and Carmel Valley Roads due to the dramatic vistas available (City of San Diego 2014a). The North Torrey Pines Road provides views of the Pacific Ocean on its west and the Los Peñasquitos Lagoon to its east. Transmission facilities (outside of those that are part of the project area) share the franchise zone with light poles and guard rails. The view across the lagoon includes roadways and existing transmission facilities. The proposed Torrey Pines Fly Yard would be located off this roadway.

Views from Carmel Valley Road are of some residential uses and the Los Peñasquitos Lagoon to the south. The views between I-5 and South Camino Del Mar are considered scenic. Existing TL666D facilities cross Carmel Valley Road. Two proposed stringing sites would be located the north of Carmel Valley Road.

Sorrento Valley Road provides views of the Los Peñasquitos Lagoon. At its northern end, existing 69-kV and 12-kV transmission facilities (TL666D) are visible to the east, in between cross-streets of the industrial park that is situated between Sorrento Valley Road and I-5.

Within the city of Del Mar, Turf Road/Jimmy Durante Boulevard, Crest Road, Carmel Valley Road, and Del Mar Heights Road are noted as important travel routes to community facilities and attractions, such as the Del Mar Fairgrounds. Turf Road/Jimmy Durante Boulevard offers views of the San Dieguito River Valley and the bluffs and hills. Existing transmission facilities are present along Jimmy Durante Boulevard, including a 12-kV line and 69-kV line (TL666D). Within the project area, the existing lines

1 are visible from Via de La Valle Road to San Dieguito Drive. Crest Road provides views of the Crest
2 Canyon and the inland San Dieguito River Basin.

3
4 From Crest Road within the project area, existing transmission facilities are partially visible because
5 vegetation screens direct views of poles and wires. Carmel Valley Road provides views of the Los
6 Peñasquitos Lagoon. An existing 69-kV line (TL666D) crosses Crest Road. Del Mar Heights Road is
7 noted as offering views of the ocean, as well (City of Del Mar 2017). TL666D extends across Del Mar
8 Heights Road at Mango Road in a southerly direction toward Torrey Pines Extension and Los Peñasquitos
9 Lagoon.

10
11 TL666D currently is located along I-5 within the project area near Carmel Mountain Road and Minorca
12 Cove, a residential street to the west of the interstate. TL666D's 12-kV and 69-kV lines span east to west
13 over I-5 travel lanes where the lines connect to a tap on the eastern side of highway corridor.

14 15 **Key Observation Points**

16 Eleven key observation points (KOPs) illustrate existing, representative views from within the project
17 area. The locations of the KOPs are shown on Figure 5.1-1, below, and description of each point is
18 provided in Table 5.1-1.



The relative spatial position of project components that would be visible in selected views from KOPs is noted by *foreground*, *mid-ground*, or *background*. A “yes” in the “Sim” column indicates that a visual simulation has been prepared for this viewpoint. Existing views are also denoted by an asterisk in the setting photos that follow. Corresponding simulated views are discussed as part of question A under Impacts. Photographs illustrating each KOP are included in Figures 5.1-2 through 5.1-7. These were taken by the applicant in September and October of 2016 and were verified by CPUC third-party observations in the field in February 2018. Photo simulations are included for KOPs 3, 4, 6, 8 as part of analysis in Section 5.1.3.

Table 5.1-1 Views from Key Observation Points

KOP	Sim	Position in View	Direction of View	Description of View
Viewpoint 1 Via De La Valle Road / Santa Fe Downs Square	yes	foreground	east	Multiple power lines are visible alongside Villa De La Valle. They also cross the roadway. Vegetation typical of the area is visible in fore- and mid-ground views. Mountains are visible in the background. Viewpoint 1 shows the proposed location for a TL666D steel riser pole, and this KOP has also been selected as viewpoint for one of three visual simulations prepared for the proposed project.
Viewpoint 2 San Dieguito Drive	no	mid-ground	southeast	Viewpoint 2 shows the existing view looking southeast along San Dieguito Drive, flanked by San Dieguito wetlands on the west side and wooden poles of TL666D on the east side of the roadway, along with a pier that juts into the lagoon. This view is located within the scenic area noted for views of the bluffs and slopes of the Del Mar Hills.
Viewpoint 3 San Dieguito Drive	yes	foreground/ mid-ground	southeast	Viewpoint 3 illustrates that the San Dieguito Lagoon is prominent in the fore- and mid-ground of this view; wooden poles associated with TL666D are also visible in foreground views from this point. This location is where the proposed project would remove TL666D poles and convert C510 to an underground configuration. This view is located within the scenic area noted for views of the bluffs and slopes of the Del Mar Hills. This KOP has been selected as the second of three visual simulations prepared for the proposed project.
Viewpoint 4 San Dieguito Drive	yes	foreground/ mid-ground	northwest	Viewpoint 4 is in an area noted for scenic views of bluffs and slopes of Del Mar Hills. Racetrack View Drive northwest view is to a small residential enclave. The blue-greenish San Dieguito Lagoon is prominent in the mid-ground. An existing wastewater pump station and TL666D are visible to the roadway's west. The proposed location of a C510 steel riser pole is visible.



1

Viewpoint 1: Existing view looking east along Via De La Valle



Viewpoint 2: Existing view looking southeast from San Dieguito Drive

Figure 5.1-2
Views from Key Observation Point Locations 1 and 2



Viewpoint 3: Existing view looking southeast along the River Path Del Mar



Viewpoint 4: Existing view looking northwest from Racetrack View Drive

Figure 5.1-3
Views from Key Observation Point Locations 3 and 4

Table 5.1-1 Views from Key Observation Points (con't)

KOP	Sim	Position in View	Direction of View	Description of View
Viewpoint 5 Red Ridge Loop Trail	no	mid-ground/ background	south	Viewpoint 5 depicts a view from an elevated portion of the Red Ridge Loop Trail, one of a number of ridge trails surrounding the open space and recreational areas in the city of Del Mar. TL666D facilities are shown in the fore- and mid-ground, and mountain ridges are visible in the background. Viewpoint 5 is located north of the noted for its scenic views of bluffs and canyons and near Crest Canyon.
Viewpoint 6 Dar West Ridge Trail	yes	foreground/ background	south-southeast	Viewpoint 6 depicts an existing view looking southeast from the Daughters of the American Revolution Memorial Trail within the city of Del Mar. From this viewpoint within the Torrey Pines State Natural Reserve, existing TL666D facilities are visible in background views across the canyon in a southerly alignment spanning along a distant ridgeline. Viewpoint 6 shows the area along the ridgeline where the project would remove TL666D infrastructure; this KOP has been selected for visual simulation of the proposed project. The viewpoint is located north of the scenic area noted for its views of the bluffs and canyons and is near the Crest Canyon area.
Viewpoint 7 Carmel Valley Road	no	mid-ground/ background	east-southeast	Viewpoint 7 faces east-southeast along Carmel Valley Road, a designated scenic corridor in the city of Del Mar. Los Peñasquitos Lagoon and Torrey Pines State Natural Reserve are visible to the south; TL666D spans southward across the reserve in mid-ground views. Views of an office complex and I-5 form a backdrop. Along the ridgeline, power line poles, a substation, a microwave tower, and residences are visible. This view is south of Crest Canyon area, noted for its scenic views of bluffs and canyons.



Viewpoint 5: Existing view looking south from Red Ridge Loop Trail



Viewpoint 6: Southeasterly view from the Daughters of the American Revolution Memorial Trail

Figure 5.1-4
Views from Key Observation Point Locations 5 and 6



Viewpoint 7: Existing view looking east-southeast along Carmel Valley Road



Viewpoint 8: Existing view looking south from Portofino Drive

Figure 5.1-5
Views from Key Observation Point Locations 7 and 8

Table 5.1-1 Views from Key Observation Points (con't)

KOP	Sim	Position in View	Direction of View	Description of View
Viewpoint 8 Portofino Drive	yes	mid-ground/ background	south	Viewpoint 8 depicts an existing view looking south from Portofino Drive, a residential street, toward Los Peñasquitos Lagoon and Torrey Pines State Natural Reserve. Carmel Valley Drive is visible in the foreground, with other roadway elements, including streetlights and a traffic signal). TL666D spans southeast into the distance. This is also the area where the proposed project would remove this infrastructure. Mid- and background include views of a mesa and hills surrounding the valley. This KOP has been selected for visual simulation of the proposed project.
Viewpoint 9 Sorrento Valley Multi-Use Path	no	foreground	south-southeast	Viewpoint 9 shows the existing view looking south-southeast along the Sorrento Valley Pedestrian/Multi-Use Path. This path is located between the retaining wall that supports I-5 on the east and the Torrey Pines State Natural Reserve on the west. Vegetation that has grown on both sides of the path and in the center of the hillside dominates mid-ground views. The existing TL666D is visible as it crosses this path in the mid-ground, along with another existing power line that is located alongside the path. In addition, an industrial facility is visible to the west of the path, as are several cellular and microwave towers on the hilltop. This KOP is located near I-5, a portion of which has been determined eligible as a state scenic highway.
Viewpoint 10 Carmel Mountain Road	no	foreground	southeast	Viewpoint 10 illustrates an existing southeast view toward the I-5 on-ramp from Carmel Mountain Road. The TL666D power line is visible against an urban backdrop. In the foreground, desert vegetation is present on the east side of a pedestrian walkway and manicured landscaping of an office/light industrial complex is visible to the west. Developed hillsides are visible in background views.



Viewpoint 9: south-southeasterly view along Sorrento Valley multi-use path adjacent Interstate 5



Viewpoint 10: Existing view looking southeast toward the ramp onto I-5 from Carmel Mountain Road

Figure 5.1-6
Views from Key Observation Point Locations 9 and 10



Figure 5.1-7
Viewpoint 11: Existing view looking south-southeast along Vista Sorrento Parkway

Table 5.1-1 Views from Key Observation Points (con't)

KOP	Sim	Position in View	Direction of View	Description of View
Viewpoint 11 Via Sorrento Parkway	yes	foreground	south-southeast	Viewpoint 11 shows an existing south-southeast view along Vista Sorrento Parkway, within which numerous existing utility structures are visible, including a TL666D riser pole, as well other infrastructure, such as streetlights and traffic signals. Developed hillsides and the I-5 corridor define the character of background views. Viewpoint 11 depicts a location where TL666D would be removed; this KOP has been selected for visual simulation of the proposed project.

Light and Glare

Sources of light and glare around the project vicinity are generally limited to the interior and exterior lights of buildings and lighting visible through windows, parking lots and city streets, and light standards lining the I-5 freeway corridor and off-ramps. These sources of light are typical of those in developed urban areas. In addition, cars and trucks travelling to, from, and within the project vicinity also represent a source of light and glare. The Del Mar Substation, located just north of Via De La Valle and east of Jimmy Durante Boulevard, is illuminated but generally not visible from public viewpoints due to its location on the slope of a hill, screened by existing vegetation.

5.1.2 Regulatory Setting

Federal

No federal laws, regulations, or standards governing aesthetics are applicable to the proposed project.

State

California Department of Transportation Scenic Highway Program

The California Department of Transportation (Caltrans) administers the State Scenic Highway Program to protect and enhance scenic highway corridors from potential visual intrusions that may affect the aesthetic value of lands adjacent to highways (California Streets and Highways Code §260, et seq.). The State Scenic Highway Program includes a list of highways that are either eligible for designation as scenic highways or already are designated as such by Caltrans (~~San Diego County~~ Caltrans 2015). If a highway is listed as eligible for official designation, it is treated similarly to an officially designated state scenic highway for purposes of environmental review. These highways are identified in California Streets and Highways Code §263 (Caltrans 2008). The program provides recommendations addressing land use and development density adjacent to affected roadways and includes the design of sites and structures; attention to and control of signage, landscaping, and grading; and other restrictions. The local jurisdiction is responsible for adopting and implementing the regulations, while the California Public Utilities Commission (CPUC) is charged with regulating the type and siting of utility infrastructure.

Within the project area specifically, and within San Diego County in general, portions I-5 have been deemed eligible for the scenic highway program. According to Caltrans, the status of a proposed state scenic highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a scenic highway (Caltrans 2008). In conjunction with maintaining and retaining scenic resources from designated roadways, Public Utilities Code, Division 1, Part 1, Chapter 2, Section 320 directs the State to “achieve ‘whenever feasible’... the undergrounding of all future electric and communication distribution facilities, which are to be constructed in proximity to any designated state scenic highway.” (Caltrans 2008)

California Coastal Act

Section 30106 of the California Coastal Act defines development as construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility. As used in this section, “structure” includes electrical power transmission and distribution lines. This would apply to the proposed project due to the inclusion of electrical power transmission and distribution lines. Section 30107 defines an energy facility as any public or private processing, producing, generating, storing, transmitting, or recovering facility for electricity, natural gas, petroleum, coal, or other source of energy.

Section 30251 of the California Coastal Act addresses how coastal areas should be considered and protected. This section requires that permitted development be sited and designed “to protect views to and along the ocean and scenic coastal area, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where, feasible, to restore and enhance visual quality in visually degraded areas.”

Local

The CPUC has jurisdiction over siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government land use planning regulations, this analysis presents local planning policies, ordinances, and guidelines pertinent to visual quality and scenic resources within the project area and vicinity for informational purposes.

County of San Diego General Plan

The San Diego County General Plan primarily directs future growth in unincorporated areas; the goals and policies of individual community plans (e.g., of the Cities of San Diego and Del Mar) address similar policy issues and provide similar guidance to ensure consistent policy outcomes may be achieved in both unincorporated areas and those under city jurisdiction. Some scenic resources extend beyond city jurisdiction and fall within unincorporated areas. TL674 is located at the edge of the San Dieguito unincorporated area, along with a portion of the proposed project in which the 69-kV line of TL674A would be removed and an access road for TL666D would be installed.

Goals and policies relevant to aesthetic resources are included the General Plan's Land Use, Conservation and Open Space, and Housing Elements (San Diego County 2011). These elements balance human development needs on the one hand with managing and protecting the natural environment on the other. Generally, policies dealing with infrastructure tend to call for incorporating natural features such as topography and vegetation into designs, including considerations of the siting of new infrastructure. In the main, policies also draw attention to known scenic resources such as scenic highway corridors and vistas in consideration of utility siting. Most local planning documents contain a policy statement that directs project sponsors and city managers to consider installing utility infrastructure underground when feasible.

City of San Diego General Plan

The City of San Diego's General Plan includes citywide goals and policies related to aesthetic resources in its following elements: Mobility; Urban Design; Public Facilities, Services, and Safety; and Conservation Elements. Goals and policies in the Mobility Element relate to the street and freeway system and strive for designs that "minimize environmental and neighborhood impacts" by preserving and protecting scenic vistas along public roadways.

The Public Facilities, Services, and Safety Element policies seek to "minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm" by "converting overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground." The General Plan urges utility design and site planning to be "well-integrated into the natural and urban landscape." Toward that end, the General Plan calls for ensuring that public utilities are "provided, maintained, and operated in a cost-effective manner that protects residents and enhances the environment" and "integrate the design and siting safely and efficiently in light of existing constraints." New and expanded public utilities should be "cooperatively planned and designed... to maximize environmental and community benefits" and be buffered or screened with landscaping between utilities and non-residential uses and to use non-building areas and/or rear setbacks" to accommodate utility connections.

The Urban Design Element considers the use of the natural landscape an important aesthetic and unifying element throughout the city. In terms of compatibility of new uses and physical development, the General Plan calls for hillside development to address the existing natural environment by enhancing views, complementing topography and contouring landforms to blend with natural terrain, minimizing grading, screening development adjacent to natural features to avoid visual intrusion and incompatibility between built and natural features, protecting scenic views of canyons and other resource areas from public roadways, and preserving views and view corridors along and into waterfront areas by stepping building heights down toward the shoreline.

A primary objective of the Conservation Element is preservation of open spaces and landforms through long-term management and conservation of the landforms, canyon lands, and open spaces that define the San Diego's urban form, provide public views/vistas, serve as core biological areas and wildlife linkages, provide wetlands habitats provide buffers within and between communities, or provide outdoor recreational opportunities. The Conservation Element's recommended guidance is similar to that in the Urban Design Element, with the objective of protecting and enhancing coastal resources by avoiding or minimizing visual clutter and obstruction along and adjacent to coastal vistas and overlook areas to ensure the public's reasonable use and enjoyment of the area's natural resources.

Several of the General Plan's local community plans also include policies and goals relevant to aesthetic resources, such as those in the Torrey Pines, Via De La Valle, Torrey Hills, and North City community plans.

Torrey Pines Community Plan

The Torrey Pines Community Plan seeks to ensure that public projects contribute to the enhancement of open space areas (City of San Diego 2014a). This plan also encompasses the North City Local Coastal Land Use Plan (LCP) except for a small area near Sorrento Valley. A portion of TL666D currently exists within the planning area near Via De La Valle and near I-5. The plan identifies Los Peñasquitos Lagoon as a scenic resource with views from North Torrey Pines Road between the Pacific Ocean and the lagoon, which are considered scenic resources. The plan contains LCP policies, recommendations, and implementing actions for the protection of visual resources that address the San Dieguito River Regional Park, Crest Canyon, Torrey Pines State Natural Reserve, Los Peñasquitos Lagoon, and the Carroll Canyon Creek Corridor. The plan recommends segments of North Torrey Pines Road, Carmel Valley Road, and Sorrento Valley Road for Scenic Route designation due to their scenic qualities (City of San Diego 2014a).

With regard to the Torrey Pines State Reserve, the plan prohibits public and private development from encroaching into or negatively impacting the Torrey Pines Extension by providing and maintaining "adequate buffer areas and appropriate landscaped screening" between development and the Reserve Extension to "avoid significant visual and erosion impacts from construction" (City of San Diego 2014a).

A similar guideline applies to the Carroll Canyon Creek Corridor that intends to preserve and enhance the environmental quality and health of the canyon and creek ecosystem. The plan also includes a specific goal that addresses the Los Peñasquitos Lagoon, urging that all aboveground power lines be relocated out of the lagoon and underground where feasible. Other LCP policies specific to the project area include protecting scenic and visual qualities of hillsides from public vantage points and recreation areas.

Via De La Valle Specific Plan

The proposed project's TL610 and TL674A components are partially located within the boundaries of the Via De La Valle community planning area. The Via De La Valle Specific Plan identifies the San Dieguito River Valley and the surrounding canyons and hillsides as important visual and aesthetic resources. As such, one of the plan's goals is to preserve areas of coastal bluffs and steep slopes to provide aesthetic enjoyment. The plan's Coastal Element North City LCP requires the undergrounding of utilities as a means of reducing visual clutter and enhancing scenic vistas. (City of San Diego 2007)

Torrey Hills Community Plan

The proposed project would be located partially within the boundaries of the Torrey Hills community planning area. The southern portions of the proposed project (TL666D and TL666) border this planning area, near the intersection of El Camino Real and Carmel Mountain Drive. The Torrey Hills Community Plan designates open spaces for protecting native vegetation and visual resources of importance to the entire community. In addition, the plan establishes as one of its key policies the encouragement of "more efficient use of land compatible with and sensitive to existing natural ecological, scenic and open space resources through innovative grading techniques and design standards" (City of San Diego 2014b). Among these open spaces is the Los Peñasquitos Canyon Preserve. The plan also encourages locating utility lines (distribution) underground.

North City Future Urbanizing Area Framework Plan

The proposed project (including TL674A) would cross the North City Future Urbanizing Area Subarea II (San Dieguito); however, no community plan is established for this area. Planning and land use policies for this area are contained in the North City Future Urbanizing Area Framework Plan (City of San Diego 2014c).

The plan notes visual sequences from the street system as the most visible part of the environment, which includes interconnected canyons, valleys, mesas, and hillsides. Scenic resources are identified along Via De La Valle from the San Dieguito River Basin west to I-5 (areas in which the proposed project would include the TL674A undergrounding), along the El Camino Real, and south of San Dieguito Road (City of San Diego 2014c). The proposed Pumpkin Patch Fly Yard would be located at the intersection of the El Camino Real and San Dieguito Road. Existing transmission lines (TL23012, TL23053, and TL610) and other street infrastructure (e.g., light poles) are present along these roadways and within this planning area.

The plan also recognizes "scenic slopes" in the planning area, as well as the San Dieguito River Park, as an area of high scenic value. In this manner, the plan notes that "Development adjacent to ridges and bluffs shall minimize visual impacts to these topographic features through setbacks and landscaping, especially near major canyons or valleys" (City of San Diego 2014c). This regulation applies to significant natural areas, significant topographic features, and the San Dieguito River Valley Regional Open Space Park Focused Planning Area.

City of Del Mar Community Plan

The City of Del Mar Community Plan includes goals and policies to address the community as a whole. It calls for conserving "the natural character of land, water, vegetative, and wildlife resources within the

community” and recognizes coastal beaches, sea cliffs, flat-topped coastal areas, steep mesa bluffs, broad level-floored stream valleys, and gently rolling hills as scenic resources. The plan identifies views as scenic toward the ocean from the beaches and the hillsides to the east of Camino del Mar, as well as the views to the east from the hillsides toward the San Dieguito Valley. Open spaces identified and protected in part for views and vistas include San Dieguito Lagoon and floodway; the beaches, bluffs, and canyons close to the ocean and at the northeast edges of the Del Mar hills; and Crest Canyon. The plan also contains a precise plan for the Scenic Loop Trail, applicable to the system of seven major trails located in the surrounding open spaces areas that are noted for their scenic qualities. (City of Del Mar 2017)

San Dieguito River Park Joint Powers Authority

The San Dieguito River Park Concept Plan (February 2002) provides a vision and goals for the future use of the San Dieguito River Valley and identifies 14 landscape units. The proposed project is located in the Del Mar Coastal Lagoon (Landscape Unit A). Within this unit, the plan calls for special design considerations, including:

- “[P]rotecting sweeping open space views”;
- Ensuring that future development will be “compatible with the open space character of the lagoon area in terms of both visual compatibility and intensity of use” while preserving and enhancing “view opportunities of the lagoon and ocean from trails and existing circulation routes”; and
- Screening all uses adjacent to the San Dieguito Lagoon, including those on the Del Mar Fairground’s property and City of Del Mar maintenance yard through the use of landscaping and “an adequate buffer including fencing if necessary, provided between development and sensitive resources to reduce adverse impacts associated with noise, lighting, stray pets, and intensive human activity.” (San Dieguito River Park Joint Powers Authority 2002)

5.1.3 Environmental Impacts and Mitigation Measures

Approach to Impact Analysis

The analysis of the proposed project’s potential aesthetic effects is based on a review of the following:

- ~~Section~~ Chapter 4.0, “Project Description,” including maps, drawings, diagrams and plans;
- Aerial and ground-level photography of the project area;
- Local planning documents, including general plans and community plans; and
- Photomontages that show the anticipated appearance of the proposed project when fully constructed.

The applicant has prepared visual simulations (photomontages) to illustrate changes in views at KOP 1, 3, 4, 6, 8, and 11, as noted in Table 5.1-1. A description of each simulation under project conditions is provided in checklist responses a) and c), below.

Applicant Proposed Measures

The applicant has not incorporated measures into the proposed project to specifically minimize or avoid impacts on aesthetic resources.

Significance Criteria

Table 5.1-2 includes the questions from Appendix G of the California Environmental Quality Act Guidelines for aesthetics to evaluate the environmental impacts of the proposed project.

Table 5.1-2 Aesthetics Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project have a substantial adverse effect on a scenic vista?

The proposed project would entail removal, reconfiguration, and installation of new utility infrastructure on two existing 69-kV tie lines and two 12-kV distribution lines that make up the four circuits associated with the proposed project (TL674A, TL666D, C510, and C738), as described in detail in Section 4.0, "Project Description." The proposed project's construction and maintenance would have neither substantial nor adverse effects on aesthetic resources, and project-related impacts to scenic vistas would be less than significant, as discussed below.

As noted above, scenic resources include views of the ocean, coastal bluffs and beaches, ridges, canyons, mountains, marshes and lagoons, and some open space and recreation areas as noted in the general plans of the City of San Diego and the City of Del Mar. As the general plans refer to these areas broadly, views depicted by the KOPs included in this study are representative views and provide a basis for the analysis of potential changes to scenic vistas within the project area. Each viewpoint is from a publicly accessible area and includes views of one or more of the types of scenic resources identified in local planning documents.

KOPs 3, 4, 6 and 8 are located within areas that the General Plan characterizes as *scenic*. Simulated views illustrating views of the proposed project from these viewpoints are included in the analysis below.

Key Observation Point 3

The simulation provided at KOP 3 depicts the view along the San Dieguito Lagoon, where TL666D would be removed from existing wood poles and C510 would transition to an underground configuration. The proposed project's activities in this location would include the topping of existing poles visible in fore- and mid-ground views, in addition to removal of 69-kV conductors. One new pole also would be installed in this area. Several poles associated with both utility lines would be removed in the background as well.



Simulated View from Key Observation Point 3

As shown in the simulation, views of the lagoon would remain largely unchanged. Foreground views from this location would change to the extent that the viewer would perceive the changes in height and bulk of the pole infrastructure. In sum, the changes would appear to lessen the impact of the existing transmission towers and lines due to the changes in height of the poles (from proposed topping) and reduction in number of overhead lines. The third furthest pole would be altered as well, to account for the reduction in overhead lines. Likewise, the background view would be altered with regard to form and line, as the transmission infrastructure associated with TL666D would be removed. These changes could be viewed as beneficial in mid- and background views from this location.

Key Observation Point 4

The simulation from KOP 4 represents a view of the proposed project looking northwest from Racetrack View Drive. As shown in the simulation, a new steel riser pole associated with the undergrounding of C510 would be erected between Racetrack View Drive and the San Dieguito Lagoon. To the west, one

pole along TL666D would be topped and an existing conductor removed. Behind the new riser pole, three TL666D poles and conductor would be removed.



Simulated View from Key Observation Point 4

The foreground view would be altered with regard to color, texture, line, and form, as the new steel riser pole would be within an immediate view from the roadway and would represent a noticeable change at the edge of the sidewalk. A viewer's attention may be drawn from the distant view, which previously focused the viewer on the bright colors of the lagoon and the distant white structures.

The mid-ground and distant views also would be altered due to the removal of poles across the lagoon. The visual changes associated with this removal would include those associated with form, line, color, and texture. They generally would be perceived as beneficial for the view, as the existing transmission line and poles disrupt the view across the lagoon.

While the view along the roadway would be disrupted in the foreground, the removal of poles and electrical wire would transform views of the lagoon to a more natural look, given that there would be less infrastructure visible in the area under project conditions than at present.

Key Observation Point 6

The simulation developed for KOP 6 shows the view of the proposed project to the southeast from the Daughters of the American Revolution Trail within the Torrey Pines State Natural Reserve. This simulation shows the removal of four TL666D poles currently located along a distant ridge.



Simulated View from Key Observation Point 6

With implementation of the proposed project, the view in the foreground and mid-ground distance zones is not impacted; however, the view to the distant ridge would change with regard to form and line. The removal of the poles would remove infrastructure currently visible, which could be beneficial to some viewers.

As shown in the photomontages created for these KOPs, poles would be removed from the Los Peñasquitos Lagoon, as well as within areas noted as scenic, especially along Jimmy Durante Boulevard and San Dieguito Drive, near Crest Canyon, and near the Torrey Pines State Natural Reserve and its extension.

Scenic roadways also have been identified in the project area. Among these are the Sorrento Valley Road, Turf Road (Jimmy Durante Boulevard), Del Mar Heights Road, and Carmel Valley Road. Along Jimmy Durante Boulevard and Del Mar Heights Road, TL666D would be removed. Seven poles in the Los Peñasquitos Lagoon also would be removed; these would be viewed from the northern portion of Sorrento Valley Road. Impacts from a scenic roadway are illustrated by the photomontage of KOP 8. The changes that would occur with construction of the proposed project are discussed below.

Key Observation Point 8

The simulation for KOP 8 shows components of the proposed project, including the removal of seven poles along TL666D within Los Peñasquitos Lagoon, as viewed from Portofino Road at its junction with Carmel Valley Road. To the south and shown in the distance on top of a mesa, a silhouetted view of a topped steel pole is simulated within the viewshed. The removal of the poles would decrease the presence of aboveground elements within the foreground and mid-ground distance zones views. The distant views would change slightly from this vantage with regard to the line and form of the topped pole.



Simulated View from Key Observation Point 8

As shown in these KOPs, project construction work would be visible in these locations, as well as in other workspaces that are in scenic areas. Views would include those of stringing sites, staging areas/fly yards, and other types of work areas. Temporary views of construction equipment and materials, trucks, helicopters, and personnel would be available for periods of days to several months. ~~In some instances~~ Work areas ~~could also be permanent and~~ would consist of the work pads (eight total), 69-kV vaults (four total), and 12-kV hand holes (five total). Views of construction activities would be limited in duration and would not result in permanent and substantial adverse changes to scenic vistas. In some locations, where poles would be removed, views would transition to a more natural look (e.g., within the lagoons).

Operation and maintenance (O&M) activities would continue to be conducted in the same manner as under existing conditions. As described in Section 4, "Project Description," the proposed underground duct banks within Via De La Valle would be installed parallel to existing facilities, where O&M activities are currently conducted. The removal of approximately 6 miles of 69-kV power lines from TL666D would eliminate the need to undertake aboveground O&M work associated with these facilities in the

future. In addition, the proposed conversion of C510 and C738 would also eliminate some of the O&M requirements associated with approximately 4,530 feet of existing overhead distribution line.

Based on the removal of existing overhead facilities and the installation of proposed project components in areas already covered by existing O&M activities, post-construction O&M requirements would be reduced. For this reason, no new impacts associated with the proposed project would be anticipated to occur to scenic vistas. As the impacts to scenic vistas would be temporary during construction, and the lasting changes would not result in substantial, adverse changes, the impact would be less than significant.

Significance: Less than Significant

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 state-designated scenic highways are located within the project area; however, a portion of I-5 is considered eligible for designation as a scenic highway. No specific trees, rock outcroppings, historic buildings, or other features are noted within the I-5 corridor as scenic resources. Construction of the proposed project could temporarily affect views in the I-5 corridor. Vehicles and crews may be visibly doing work to remove the overhead wire. Though such views are expected to be during nighttime hours, and would be temporary and thus likely only visible to a limited number of observers because Caltrans would schedule a temporary closure of the affected portion of I-5 to safely complete the work. Thus, the visual condition is intermittent and would only alter the visual character of the corridor for a short-period of time when crews are actively removing the overhead wire.

Between Racetrack View Drive and Lozana Road, the proposed project would include topping existing poles along the ridge to the west of I-5, removing poles in the Torrey Pines State Natural Reserve, and removing overhead conductor for TL666D at the southern end of the project area. These changes would alter the current view through the elimination of poles and overhead lines (i.e., changes in lines and form). These changes, however, would not constitute a substantial, adverse change to the scenic qualities of I-5; rather, given that the proposed project would eliminate infrastructure elements currently visible from both and southbound travel lanes, some may consider the change beneficial.

As previously noted under checklist item a), O&M activities would be reduced as part of the proposed project due to the removal of TL666D (i.e., transfer of aboveground components from the existing setting to underground, where they would no longer be part of the observable setting) and the conversion of C510 and C738. As noted above, O&M activities would be conducted in the same manner as at the existing facilities, and some existing components would be eliminated as part of the proposed project. For this reason, no impacts would be anticipated to occur because of the proposed project. As the views to and from I-5 would not be substantially or adversely impacted by the proposed project, the proposed project would not preclude designation of the affected portion of I-5 from listing as a state scenic highway. This impact would therefore be less than significant.

Significance: Less than Significant

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

As previously indicated, construction equipment, trucks, personnel, and work activities would be visible from aesthetic resources (e.g., canyons, lagoons, and scenic roadways) located throughout the project area. As part of construction, temporary staging areas/fly yards would be visible; however, the construction would be limited in duration and would occur in individualized locations (thereby limiting the area or length of a view at a particular time) along the project route. In areas where undergrounding is proposed, trenching activities would be visible from public roadways and surrounding areas. To the extent possible, trenches would be located along disturbed roadways or rights of way, and they would be backfilled, reseeded, and restored to pre-construction conditions where feasible, as noted in Section 4.0, "Project Description."

At completion of construction, trenched areas would be covered and would appear, over time, as they do under current conditions. The overall visual character of the project area is represented by KOPs 1 and 11, along with KOPs 3, 4, 6, and 8, which were previously noted. The visual changes that would occur at these locations with the construction of the proposed project are noted by the photomontages developed for KOPs 1 and 11. These two KOPs represent typical views of the proposed project from two publicly accessible locations. The views of the proposed project in these two locations are described below.



Simulated View from Key Observation Point 1

Key Observation Point 1

The simulated view at KOP 1 shows the new steel riser pole that would be installed along Via De La Valle near the northern terminus of the proposed project. The proposed pole would be located along the road in an existing utility corridor. The simulation shows the removal (i.e., undergrounding) of TL674A overhead conductor, which would cross the roadway. On the south side of the new pole, TL674A would resume its overhead configuration, as it travels in a southerly direction. While background views of the mountains and immediate views of the vegetation/roadway are present in this view, these views would not be impeded by the new pole, due to both existing vegetation and poles in the immediate vicinity. The view from this location generally would remain the same in its overall appearance. Visual changes represented in this simulation include the addition of a steel riser pole and the removal of an overhead conductor.

Key Observation Point 11

For KOP 11, the photomontage shows portions of the proposed project along Via Sorrento Parkway at the southern terminus of the proposed project.



Simulated Views from Key Observation Point Location 11

As shown in the simulation, the 69-kV conductor on the existing pole would be removed, the power line would connect to an existing underground portion of the line, and the existing 12-kV conductor would be left in place. The visual change related to the removal of the conductor lines would occur in the foreground. The height of the existing ~~tower~~ pole would remain unchanged. The mid-ground and distant views from this location would largely remain the same.

As shown by these photomontages, while visual change does occur, it is largely associated with the removal of existing aboveground components and alterations to existing poles. These changes, when temporary construction activities are completed, would return the setting to a more natural appearance or one with less aboveground infrastructure. In this manner, the impacts to the visual character or quality would be less than significant.

As previously noted for checklist item a), O&M activities would be reduced as part of the proposed project due to the removal of TL666D (i.e., the transfer of aboveground components from the existing setting to underground where they are no longer part of the setting) and the conversion of C510 and C738. As noted above, O&M activities would be conducted in the same manner as at the existing facilities or, for some project components, would be eliminated. For this reason, no impacts would be anticipated to occur due to the operation and maintenance of the proposed project.

The resulting impact on visual character or quality would be less than significant.

Significance: Less than Significant

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

Construction of the proposed project would primarily occur during regular construction hours, as directed by local noise ordinances within the cities of San Diego and Del Mar. For some construction activities (e.g., the removal of the TL666D conductor over I-5), work may be required at night. If nighttime construction activity were to occur, **MM BR-7** (see Section 5.4, "Biological Resources") requires any temporary lighting used during nighttime construction work use the lowest illumination levels necessary for worker safety, in accordance with Occupational Health and Safety Administration standards. Lighting shall be focused on work areas and directed away from adjacent uses and sensitive receptors to the extent feasible to limit unwanted light spillage and glare. Lighting sources in wildlife corridors shall be low-sodium illumination or similar, in accordance with the City of San Diego Multi Habitat Planning Area requirements. These measures ensure temporary nighttime lighting effects would be less than significant.

No permanent sources of lighting would be required for the proposed project. In addition, and as described previously, O&M activities are typically conducted in daytime hours but would be reduced as part of the proposed project due to removal of TL666D (i.e., existing aboveground C510 and C738 components would be undergrounded where they would be protected from the elements and are assumed to require less maintenance than under existing conditions). O&M activities would be conducted in a manner scaled to component need under the project configuration. As a result, the impact would be less than significant with mitigation identified in this Initial Study.

Significance: Less than Significant with Mitigation Incorporation.

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5.2 Agriculture and Forest Resources

5.2.1 Environmental Setting

San Diego County comprises over 2.7 million acres, with just over 9 percent of its land, around 250,000 acres, in agricultural use. The Tecate Divide runs north-south over the Cuyamaca Mountains and topographically separates lands descending to the Pacific Ocean on the west from the high desert to the east. The county is home to 5,732 farms, more than any other county in the United States. The majority of farms are on the western, coastal side of the Tecate Divide and are generally 9 or fewer acres in size. Agriculture is a key contributor to the area's economy. High water and land costs make farming in the region expensive and encourage growers to raise high value products, including nursery, flower, fruit, nut, and vegetable crops. In 2015, roughly a quarter of the county's agricultural land produced 90 percent of the agricultural output, valued in excess of \$1.7 billion (County of San Diego Department of Weights and Measures 2015).

Approximately 1.2 miles of existing utility transmission lines extend across land that the City of San Diego's zoning ordinance designates *Agricultural-Residential* (AR). The existing lines, described in ~~Section~~ Chapter 4.0, "Project Description," include 0.71 miles of the 69-kilovolt (kV) TL666D alignment; 0.51 miles of the TL674A alignment, and 0.1 miles of the 12 kV C738 alignment. None of the underlying land where these utility poles and power lines are located is actively cultivated or used for livestock grazing. Moreover, existing power lines that are part of the proposed project are not located on nor do they currently span any land zoned for forest or timberland use.

5.2.2 Regulatory Setting

Federal

Farmland Protection Policy Act of 1981 (Public Law 97-98, Title XV, Subtitle I § 1539-1549).

Enacted by the U.S. Congress to protect farmland, this act minimizes federal programs' unnecessary and irreversible conversion of farmland to nonagricultural uses. Projects are subject to the act if they may irreversibly convert farmland to nonagricultural use.

State

California Land Conservation Act of 1965 ("Williamson Act"). This state policy (California Code, Chapter 7 § 51200–51297.4) enables local governments to enter into ongoing contracts with private landowners to restrict specific parcels of land to agricultural or compatible uses for a minimum of 10 years. San Diego County has a 100 acre-minimum for Williamson Act contracts (County of San Diego n.d.). The proposed project would not affect any Williamson Act contract lands.

Farmland Mapping and Monitoring Program. Established in 1982 and administered by the California Department of Conservation, the Farmland Mapping and Monitoring Program (FMMP) provides consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural resources. The FMMP designates use categories, tracks changes to the state's inventory of agriculture lands, and establishes a minimum mapping unit of 10 acres for application of the FMMP. Agricultural lands are those designated *Prime Farmland*, *Farmland of Statewide Importance*, and *Unique Farmland*, as follows:

- *Prime Farmland* refers to the best combination of physical and chemical features (e.g., soil quality, growing season, and moisture supply) to sustain long-term agricultural production and produce high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- *Farmland of Statewide Importance* is land similar to *Prime Farmland*, but with minor shortcomings (e.g., greater slopes, less ability to store soil moisture, etc.). Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- *Unique Farmland* is land that is usually irrigated, consists of lesser quality soils, and is used for the production of the state's leading agricultural crops that may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date (DOC 2004).

The FMMP designates *Urban and Built-Up Land* as land occupied by buildings or other structures at densities equal to or greater than one structure per 1.5 acres where a wide variety and type of uses may be present, including residential, commercial, industrial, construction, public administration, institutional, transportation yards, airports, cemeteries, golf courses, sewage treatment, sanitary landfills, and water control structures. *Other Land Uses* include those with waterbodies smaller than 40 acres; low-density rural developments; confined livestock, poultry, or aquaculture facilities; and brush, timber, wetland, and riparian areas not suitable for livestock grazing.

Forest Resources. Forest land is defined by California Code, Public Resources Code, Section 12220(g) as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Regional and Local

California Public Utilities Commission General Order 131-D, Section XIV.B, states that "local jurisdictions acting pursuant to local authority are preempted from regulating electrical power line projects, distribution lines, substations or electrical facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters."

County of San Diego General Plan and Zoning Ordinance. The County of San Diego General Plan's Land Use and Conservation and Open Space Elements seek to minimize land use conflicts, preserve agricultural resources, and support the long-term presence and viability of agricultural industry, important

component of the region's economy and open space linkage (County of San Diego 2011). The proposed project would not conflict with General Plan agricultural policies. The county's Zoning Ordinance includes two agricultural zoning designations: *Limited Agricultural Use Regulations* (A70) and *General Agricultural Use Regulations* (A72) that apply to land on which project infrastructure is located. The project would not conflict with these zoning designations (County of San Diego 2017).

City of San Diego General Plan and Zoning Ordinance. The City of San Diego's General Plan characterizes agricultural lands as rural, very low-density areas where dairies; horticulture nurseries and greenhouses; raising and harvesting of crops; raising, maintaining and keeping of animals; separately regulated agriculture uses; and single dwelling units may be present. The General Plan does not identify any specific agricultural goals or policies that appear inconsistent with the proposed project (City of San Diego 2008). The AR and *Agricultural-General* (AG) zones in San Diego's municipal zoning ordinance permit a range of agricultural uses and some limited nonagricultural uses. The AR zone permits agricultural activities in conjunction with limited, low-density residential use (City of San Diego 2017). As discussed in 5.2.1, Environmental Setting, existing power lines that are part of the proposed project are located on AR-zoned land.

Community Plan for City of Del Mar and Zoning Ordinance. The City of Del Mar's Community Plan and Zoning Ordinance establish a framework of policies, objectives, and land use designations to guide long-term development. The Community Plan does not include any specific goals or policies related to agriculture, nor are any provisions regulating agricultural zones relevant to the proposed project included within Del Mar's zoning ordinance (City of Del Mar 1976, 2017).

5.2.3 Environmental Impacts and Assessment

Applicant Proposed Measures

The applicant has not identified any applicant-proposed measures (APMs) specific to agriculture and forestry resources to minimize or avoid impacts. Implementation of APM BIO-5, discussed under b), below, would further reduce the magnitude of less-than-significant construction effects by minimizing potential conflicts with land zoned for agricultural use.

Significance Criteria

Table 5.2-1 presents the significance criteria from Appendix G of the CEQA Guidelines used to evaluate potential impacts related to agriculture and forest resources. Project construction and maintenance/operations phases are considered in the analyses, with the level of analytical detail commensurate with the project's potential to result in adverse physical changes to the environment. No agricultural forest land exists along project alignments. Thus, criteria (c) and (d) are not discussed further.

Table 5.2-1 Agriculture and Forest Resources Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

The proposed project would not convert *Prime Farmland, Unique Farmland, or Farmland of Statewide Importance* to non-farmland use; therefore, no impact would occur under this criterion.

Significance: No Impact.

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

The proposed project would result in modification and removal of utility infrastructure along the existing 69-kV TL666D and TL674A alignments, as well as a portion of the 12-kV C738 alignment. Construction activities would entail removal of utility poles, topping of existing poles, trenching and undergrounding segments of these power lines, as well as decommissioning service on TL666D upon project completion. Most construction would be carried out within SDG&E's existing rights-of-way or within the franchise portion (i.e., spaces not subject to zoning) of the city of Del Mar and city of San Diego streets.

Where project activities would occur on land zoned AR, the project would not to conflict with or preclude agricultural uses on AR zoned land. It is noted that, while AR zone expressly permits farming, no cultivation or grazing currently occurs on the 1.2 miles of land with this zoning designation in the project

area, nor would implementation of the proposed project preclude farming uses on these lands in the future.

Per **APM BIO-5**, all areas disturbed as a result of project construction would be re-contoured and restored to original conditions. Operation and maintenance of the circuitry would not convert Farmland to non-agricultural or forest land to non-forest use. Finally, the proposed project would not affect any Williamson Act contract lands and, no impacts to agriculture and forest resources would occur.

Significance: No Impact.

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

Construction and operation of the proposed project would not conflict with any land designated for forestry or timberland use; therefore, no impact would occur under this criterion.

Significance: No Impact.

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

Construction and operation of the proposed project would not conflict with any land designated for forestry or timberland use; therefore, no impact would occur under this criterion.

Significance: No Impact.

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?

For reasons stated in responses a) and b) above, the proposed project's construction, operation, and maintenance would result in no impacts to farmland or timberland.

Significance: No Impact.

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5.3 Air Quality

5.3.1 Environmental Setting

5.3.1.1 Air Basin

The proposed project would be located in the San Diego Air Basin (SDAB). The boundary of the SDAB is coterminous with the boundary of San Diego County and covers an area of approximately 4,200 square miles. The San Diego Air Pollution Control District (SDAPCD) regulates air quality in the SDAB.

5.3.1.2 Climate and Meteorology

Climatological data are recorded at a monitoring station at San Diego Lindbergh Field, located approximately 12 miles south of the project area (WRCC 2016). The overall climate in the SDAB is generally warm, with low annual rainfall occurring primarily during the winter months. According to the WRCC Climate Data Summary, the average maximum temperature is 76.3 degrees Fahrenheit (°F) in August, and the average minimum temperature is 48.1°F in January (WRCC 2016). Average annual precipitation is 10.13 inches, occurring primarily from November through March. Climatological data recorded in San Diego Lindbergh Field are summarized in Table 5.3-1.

Table 5.3-1 Climatological Data Summary, San Diego Lindbergh Field

Month	Temperature (°F)		Average Monthly Precipitation (inches)
	Average Maximum	Average Minimum	
January	64.8	48.1	2.00
February	65.2	49.7	1.98
March	65.9	51.9	1.63
April	67.4	54.7	0.78
May	68.6	58.1	0.21
June	70.9	60.8	0.05
July	74.8	64.4	0.02
August	76.3	65.7	0.06
September	75.7	63.9	0.17
October	72.9	59.3	0.51
November	69.9	52.9	0.97
December	65.8	48.7	1.77
Annual	69.9	56.5	10.13

Source: WRCC 2016

Climate plays an important role in the air quality of the SDAB. Air temperature in the lowest layer of the atmosphere typically decreases with altitude. However, meteorological factors can occasionally create conditions for the temperature to increase with altitude. The height at which the temperature stops decreasing with altitude and starts increasing is called inversion height, or “mixing height.” Pollutants mix vertically up to the mixing height, above which vertical dispersion is inhibited. Therefore, a temperature inversion causes air pollutants to be trapped below the inversion height, resulting in higher ambient concentrations. Within the SDAB, inversion occurs when cool, moist air from the coast travels towards higher elevations. Most air quality exceedances are recorded on the lower mountain slopes, which experience an inversion layer.

Local meteorological conditions in the project vicinity conform to a typical regional diurnal (twice daily) wind pattern of strong onshore winds by day (especially in summer) and weak offshore winds at night (particularly during the winter). These local wind patterns are driven by the temperature difference between the ocean and warm interior topography. In the summer, moderate breezes between 8 and 12 miles per hour blow onshore. Light onshore breezes may continue overnight when the land remains warmer than the ocean. In the winter, the onshore flow is weaker and the wind flow reverses to blow from the northeast in the evening as the land becomes cooler than the ocean.

5.3.1.3 Ambient Air Quality

Air Pollutant Standards and Definitions

The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for several pollutants based on their adverse health effects. The EPA has set National Ambient Air Quality Standards (NAAQS) for ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 microns (PM₁₀), fine particulate matter less than 2.5 microns (PM_{2.5}), sulfur dioxide (SO₂), and lead (Pb). These pollutants are commonly referred to as “criteria pollutants.” Primary standards were set to protect public health; secondary standards were set to protect welfare against visibility impairment, damage to animals, crops, vegetation, and buildings. Furthermore, CARB has established California Ambient Air Quality Standards (CAAQS) for these pollutants, as well as for sulfate (SO₄), visibility reducing particles, hydrogen sulfide (H₂S), and vinyl chloride. California standards are generally stricter than national standards (CARB 2015).

The “attainment” level refers to the status of a given airshed with regard to NAAQS or CAAQS requirements. The following three air quality attainment designations are given to an airshed for a particular pollutant:

- Nonattainment: Air quality standards have not been consistently achieved.
- Attainment: Air quality standards have been achieved.
- Unclassified: Insufficient monitoring data exist to determine a nonattainment or attainment designation.

Table 5.3-2 summarizes the federal and state attainment status for the SDAPCD, as of 2017, based on the NAAQS and CAAQS, respectively.

Table 5.3-2 Attainment Status for San Diego County Air Pollution Control District

Pollutant	Designation/Classification	
	Federal	State
Ozone (O ₃)	Nonattainment	Nonattainment
Particulate Matter (PM ₁₀)	Unclassified	Nonattainment
Particulate Matter (PM _{2.5})	Attainment	Nonattainment
Carbon monoxide (CO)	Attainment	Attainment

Table 5.3-2 Attainment Status for San Diego County Air Pollution Control District

Pollutant	Designation/Classification	
	Federal	State
Nitrogen dioxide (NO ₂)	Attainment	Attainment
Sulfur dioxide (SO ₂)	Attainment	Attainment
Hydrogen sulfide (H ₂ S)	No Federal Standard ^(a)	Unclassified
Sulfates (SO ₄)	No Federal Standard ^(a)	Attainment
Visibility reducing particulate	No Federal Standard ^(a)	Unclassified

Source: SDAPCD 2017

Note:

^(a) There are no federal standards for sulfates, hydrogen sulfide, or visibility-reducing particles.

Key:

PM₁₀ = particulate matter less than 10 microns in diameter

PM_{2.5} = particulate matter less than 2.5 microns in diameter

Ozone

Both the upper atmosphere (ozone layer) and ground level contain O₃. O₃ is considered a pollutant at ground level. It forms when precursors (i.e., reactive organic gases, CO, nitrogen oxides [NO_x], volatile organic compounds [VOCs]) react with sunlight in the atmosphere. In general, sources for these precursors include fuel combustion in vehicles and industrial processes, gasoline vapors, and chemical solvents. O₃ can cause respiratory complications (i.e., chest pain, coughing, and throat irritation) or exacerbate existing respiratory problems, such as asthma and bronchitis. Temperature inversions and atmosphere oscillation increase O₃ levels in the SDAB. Pollutants trapped by temperature inversions undergo photochemical reactions that produce O₃. Atmospheric oscillations that result in transport of air pollutants from the Los Angeles region to San Diego County contribute to O₃ concentrations in the SDAB. O₃ is currently the only pollutant not in attainment of NAAQS in the SDAB. (SDAPCD 2017)

Respirable Particulate Matter (PM₁₀)

Particulate matter is a combination of liquid or solid particles suspended in the air. PM₁₀ particles are smaller than 10 micrometers in diameter and typically include dust, pollen, and mold. These particles are a threat to human health because they can enter the lungs and exacerbate asthma and bronchitis and potentially contribute to premature death. PM₁₀ is a concern in the SDAB due to noncompliance with the state standard. (SDAPCD 2017)

Fine particulate Matter (PM_{2.5})

PM_{2.5} particles are smaller than 2.5 micrometers in diameter and typically include combustion particles, organic compounds, and metal particles. PM_{2.5} particles are more hazardous to human health than PM₁₀ because they contain a larger variety of dangerous components than PM₁₀ and can travel farther into the lungs, thus potentially causing scarring of lung tissue and reduced lung capacity. PM_{2.5} particles are one of the pollutants of greatest concern in the SDAB due to noncompliance with the state standard. (SDAPCD 2017)

Carbon Monoxide

CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest in the winter morning, when surface-based inversions trap the pollutant at ground level. CO is emitted directly from internal combustion engines. The primary source of CO in urban areas is motor vehicles. Exposure to CO results in reduced oxygen-carrying capacity of the blood. High CO concentrations can result in health risks, particularly for individuals with compromised cardiovascular systems. CO is not usually a concern in the SDAB because the federal and state standards have only been violated once since 1990, and that violation occurred during a firestorm.

Nitrogen Dioxide

NO₂ forms during combustion of fossil fuels from vehicles and industrial processes. NO₂ is an O₃ precursor, which can also cause acid rain and acid snow. Health effects of NO₂ include airway inflammation and exacerbation of preexisting asthma. NO₂ is one of the pollutants of greatest concern in San Diego County.

Sulfur Dioxide

SO₂ is a colorless, acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oils, coals, and diesel. SO₂ has the potential to damage building materials and can cause health effects at high concentrations. Health effects of SO₂ exposure include respiratory effects such as exacerbation of asthma and bronchitis. SO₂ is a precursor to the formation of atmospheric sulfate and particulate matter and contributes to potential acid rain. SO₂ is not a pollutant of concern in the SDAB because low sulfur fuels are used, and there has not been a violation of federal or state standards for this pollutant (SDAPCD 2017).

Lead

Lead air emissions were initially problematic when leaded gasoline was common. Today, leaded gasoline is uncommon, and the main sources of lead emissions are lead smelters and aircrafts that use leaded gasoline. Lead causes health effects to the nervous system, kidneys, immune system, reproductive system, and cardiovascular system. Lead air emissions have decreased significantly, since leaded gasoline is no longer used in vehicles. There have been no violations of federal or state standard since 1980 and 1987, respectively.

Hydrogen Sulfide

H₂S is generally released during natural gas purification, oil refinement, and geothermal energy production. Health effects of H₂S exposure include respiratory irritation, headaches, and, at higher levels, adverse effects to organs.

Sulfates

A sulfate is a form of sulfur. Most sulfate emissions come from burning fossil fuels. Health effects of sulfate exposure include exacerbation of asthma, increased risk of cardio-pulmonary disease, and lung irritation. Most sulfates in air form through oxidation of SO₂ from fuel combustion. SO₂ is not a pollutant of concern in the SDAB because low-sulfur fuels are used, and there has never been a violation of federal or state standards.

Local Air Quality

The SDAPCD maintains ambient air quality monitoring stations in San Diego County. Each monitoring station collects data on a variety of criteria pollutant concentrations. The nearest San Diego monitoring station is approximately 9 miles east of the project area and provides the most representative data for O₃, NO₂, CO, PM₁₀, and PM_{2.5}. No SO₂ monitoring stations are located near the project area. Table 5.3-3 presents local ambient air quality monitoring data for the two-year period of 2014 to 2016 and compares measured pollutant concentrations against the most stringent applicable NAAQS or CAAQS standards.

Table 5.3-3 Local Ambient Air Quality Concentration at Nearby Monitoring Stations

Pollutant ^(a)	Most Stringent Applicable Standard ^(c)	Maximum Concentration ^(b)		
		2014	2015	2016
O ₃				
Number of days 1-hour standard exceeded	0.09 ppm	0	0	0
Maximum 1-hour (ppm)		0.099	0.077	0.087
Number of days 8-hour standards exceeded	0.07 ppm	4	0	3
Maximum 8-hour (ppm)		0.081	0.07	0.075
NO ₂				
Number of days 1-hour standard exceeded		-	-	-
Maximum 1 hour (ppm)	0.18 ppm	0.051	0.051	0.053
CO ^(b)				
Number of days 1-hour standard exceeded	20 ppm	0	0	0
Maximum 1-hour (ppm)		2.7	2.4	2
Number of days 8-hour standards exceeded	9 ppm	0	0	0
Maximum 8-hour (ppm)		1.9	1.4	1.2
SO ₂				
Number of days 1-hour standard exceeded	0.25 ppm	-	-	-
Maximum 1 hour (ppm)		-	-	-
PM ₁₀				
Maximum 24-hour (µg ³ /m ³)		39	39	36
Estimated days 24-hour standard exceeded	50 µg ³ /m ³	0	0	0
Estimated days 24-hour standard exceeded	150 µg ³ /m ³	0	0	0
PM _{2.5}				
Maximum 24-hour (µg ³ /m ³)		20.2	25.7	20.3
Number of days 24-hour standard exceeded	35 µg ³ /m ³ ^(d)	-	-	-
Annual average (µg ³ /m ³)		8.2	7.2	7.8

Sources: EPA 2014, 2015, 2016.

Notes:

^(a) Information attained from monitoring station that records this pollutant nearest project component.

^(b) **Bold** values indicate an exceedance of an applicable standard

^(c) State standard, not to be exceeded

^(d) Federal standard, not to be exceeded

Key:

µg³/m³ = micrograms per cubic meter

- = No data are available

NO₂ = nitrogen dioxide

O₃ = ozone

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

ppm = parts per million

SO₂ = sulfur dioxide

5.3.1.4 Sensitive Receptors

Sensitive receptors are defined as people or other organisms that are more susceptible or substantially more sensitive to the adverse effects of exposure to air pollutants. The most common sensitive receptors are residences, apartments, hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. Individuals at these receptors may have an increased sensitivity to contaminants by virtue of their age and health. Receptors may also be sensitive due to their proximity and increased exposure to a contamination source. For the purposes of this analysis, sensitive receptors in the project area consist of residential uses (single- and multi-family housing), schools, educational learning centers, and parks and recreational areas.

Project-related air quality impacts fall into two categories: short-term impacts related to emissions during construction activities, and long-term impacts related to project operation. The proposed project's potential air quality impacts would occur in the short term and would be related to the use of motorized tools and equipment, as shown in Tables 4.6-1 and 4.6-2 of ~~Section~~ Chapter 4.0, "Project Description" during an anticipated 12-month construction period.

Implementation of the proposed project would result in reconfiguration of the local electrical network in which high-wire overland distribution lines would be replaced with circuitry underground, and ancillary substation equipment (circuit breaker) would be removed and replaced to ensure proper network functionality. The physical changes to the network resulting from the proposed project address system reliability and would not alter or increase the network's current capacity or electrical throughput. ~~As such, the proposed project's occasional maintenance and repair needs would constitute the operational phase with regard to assessing air quality impacts.~~ Similar to current conditions, operation and maintenance of the transmission and distribution lines would have minimal air quality impacts, mainly associated with vehicle trips used to access lines for inspection and repair as needed. The proposed project would not represent a new stationary emissions source.

The following air quality analysis focuses on the nearest sensitive receptor exposure to the proposed project's construction activities and duration by construction phase. Several sensitive receptors (residences, schools and public open spaces) are within a range of approximately 1,000 feet from the proposed project alignment. Table 5.3-4 illustrates the sensitive receptors that would be located directly adjacent to or within the project area and highlights the type equipment and foreseeable activities that would be temporary sources of dust and machinery exhaust during construction.

Table 5.3-4 Proposed Project Nearest Sensitive Receptors

Project Component and Activity	Equipment and Vehicle Use During Construction	Approx. Duration (months)	Nearest Sensitive Receptor (feet approx.)	Receptor Type ^(a)
TL674A Reconfiguration				
Foundation Installation, Pole Installation, Reconfigure Tap, Duct Bank, Underground Cable Installation	Tractors, Loaders, Backhoes, Air Compressors, Cranes, Forklifts	1	115	Residence
			283	Solano Santa Fe Elementary School
TL666D Removal				
Conductor Removal, Pole Removal and Modification	Tractors, Loaders, Backhoes, Air Compressors, Aerial Lifts, Cranes, Bore and Drill Rigs	1.5	11	Residence
			27	Del Mar Hills Elementary School
C510 Conversion				
Conductor/Cable Installation and Removal, Foundation Installation, Pole Installation and Removal,	Tractors, Loaders, Backhoes, Air Compressors, Aerial Lifts, Cranes, Bore and Drill Rigs, Forklifts	1.5	42	Residence
C738 Conversion				
Conductor/Cable Installation and Removal, Pole Installation and Removal, Duct Bank	Tractors, Loaders, Backhoes, Air Compressors, Aerial Lifts, Cranes, Bore and Drill Rigs	1	445	Shaw Valley Open Space
<u>Circuit Breaker Removal Replacement, Del Mar Substation</u>				
<u>Circuit breaker removal, potential foundation work, debris removal/ off-haul, replacement breaker installation</u>	<u>Loaders, trencher, forklifts, Jackhammer, Dump/Haul Truck</u>	<u>3.75</u>	<u>228</u>	<u>Therapeutic Learning Center</u>
All				
Staging Yard/Fly Yard	Helicopters, Tractors Loaders, Backhoes, Air Compressors, Aerial Lifts, Cranes, Bores and Drill Rigs, Forklifts	12	361	Del Mar Heights School
			121	Fairbanks Ranch Country Club

Note:

^(a) Nearest schools located directly adjacent to or within the project area are represented in **bold** text.

5.3.2 Regulatory Setting

5.3.2.1 Federal

Clean Air Act

The Clean Air Act (CAA; United States Code Title 42, Chapter 85) defines the EPA's responsibilities for protecting and improving the nation's air quality and the stratospheric ozone layer. The last major changes to the law, the CAA Amendments of 1990, were enacted by Congress in 1990. Legislation passed since then has resulted in several minor changes. Under the CAA, the EPA oversees implementation of federal programs for permitting new and modified stationary sources, controlling toxic air contaminants, and reducing emissions from motor vehicles and other mobile sources. The sections of the CAA most applicable to the proposed project are Title I (Air Pollution Prevention and Control) and Title II (Emission Standards for Mobile Sources).

Title I of the CAA requires establishment of NAAQS, air quality designations, and plan requirements for nonattainment areas. States are required to submit a state implementation plan (SIP) to the EPA for areas in nonattainment with NAAQS. The SIP, which is reviewed and approved by the EPA, must demonstrate how state and local regulatory agencies will institute rules, regulations, and/or other programs to achieve attainment with NAAQS. NAAQS are presented in Table 5.3-5.

Table 5.3-5 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ^{(a), (b)}	National Standards ^{(b), (c)}	
			Primary ^(d)	Secondary ^(e)
Ozone (O ₃)	1-Hour	0.09 ppm (180 µg/m ³)	---	---
	8-Hour	0.07 ppm (137 µg/m ³)	0.07 ppm (137 µg/m ³)	0.07 ppm (137 µg/m ³)
Carbon monoxide (CO)	1-Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	---
	8-Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	---
Nitrogen dioxide (NO ₂)	1-Hour	0.18 ppm (339 µg/m ³)	0.1 ppm (188 µg/m ³)	---
	1-Year	0.03 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	0.053 ppm (100 µg/m ³)
Sulfur dioxide (SO ₂) ^(g)	1-Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	---
	3-Hour	---	---	0.5 ppm (1,300 µg/m ³)
	24-Hour	0.04 ppm (105 µg/m ³)	---	---
Respirable Particulate Matter (PM ₁₀) ^(h)	24-Hour	50 µg/m ³	150 µg/m ³	150 µg/m ³
	1-Year	20 µg/m ³	---	---
Fine Particulate Matter (PM _{2.5}) ^(h)	24-Hour	---	35 µg/m ³	35 µg/m ³
	1-Year	12 µg/m ³	12.0 µg/m ³	15 µg/m ³
Lead (Pb)	30-Day	1.5 µg/m ³	---	---
	Rolling 3-Month	---	0.15 µg/m ³	0.15 µg/m ³

Table 5.3-5 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ^{(a), (b)}	National Standards ^{(b), (c)}	
			Primary ^(d)	Secondary ^(e)
Hydrogen sulfide (H ₂ S)	1-Hour	0.03 ppm (42 µg/m ³)	No Federal Standards	
Sulfates (SO ₄)	24-Hour	25 µg/m ³		
Visibility reducing particles	8-Hour	See Note (i)		
Vinyl chloride ^(f)	24-Hour	0.01 ppm (26 µg/m ³)		

Source: CARB 2015

Notes:

- (a) CAAQS for O₃, CO (except 8-hour Lake Tahoe), SO₂ (1- and 24-hour), NO₂, PM₁₀, and visibility reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.
- (b) Concentration expressed first in units in which it was promulgated. Parts per million in this table refers to ppm by volume or micromoles of pollutant per mole of gas.
- (c) NAAQS (other than ozone, particulate matter, and standards based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth-highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is not to be exceeded more than once per year on average over 3 years. The 24-hour standard is attained when the 3-year average of the weighted annual mean at each monitor within an area does not exceed 150 µg/m³. For PM_{2.5}, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, do not exceed 35 µg/m³. The annual standard is attained when the 3-year average of the weighted annual mean at single or multiple community-oriented monitors does not exceed 12 µg/m³.
- (d) National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.
- (e) National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse impacts of a pollutant.
- (f) The federal 1-hour ozone standard was revoked for most areas of the United States, including all of California on June 15, 2005.
- (g) Final rule signed June 2, 2010. The 1971 annual and 24-hour SO₂ standards were revoked in that same rulemaking.
- (h) On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12 µg/m³. Existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- (i) In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.
- (j) CARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health impacts determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Key:

CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
mg/m ³	milligrams per cubic meter
NAAQS	National Ambient Air Quality Standards
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
ppm	parts per million
µg/m ³	micrograms per cubic meter

Title II of the CAA contains a number of provisions regarding mobile sources, including requirements for reformulated gasoline, tailpipe emission standards for cars and trucks, and standards for heavy-duty vehicles that would be utilized during construction of the proposed project.

National Emission Standard for Hazardous Air Pollutants

The CAA defines as hazardous air pollutants (HAPs) a variety of substances that pose serious health risks. Direct exposure to HAPs has been shown to cause cancer, reproductive effects or birth defects, damage to brain and nervous system, and respiratory disorders. HAP emission sources are categorized

and controlled through separate standards under CAA Section 112: National Emission Standards for Hazardous Air Pollutants (NESHAP). These standards are designed to reduce the potency, persistence, or potential bioaccumulation of HAPs.

Asbestos is a HAP regulated under the EPA NESHAP. The asbestos NESHAP is intended to provide protection from the release of asbestos fibers during activities involving the handling of asbestos. Air toxics regulations under the CAA outline work practices for controlling asbestos during demolitions and renovations. The regulations require a thorough inspection of the work area, advance notification to CARB, and proper handling and disposal of all asbestos-containing materials.

5.3.2.2 State

California Clean Air Act

The California Clean Air Act (CCAA) outlines a statewide air pollution control program in California. CARB is the primary administrator of the CCAA at the state level, while local air quality districts administer air rules and regulations at the regional level. CARB is responsible for implementing the provisions of the CCAA, including establishing CAAQS, maintaining oversight authority in air quality planning, developing programs for reducing emissions from motor vehicles, regulating emissions from consumer products, developing air emission inventories, collecting air quality and meteorological data, and preparing the SIP. CARB uses air quality management plans prepared by local air quality districts to inform the SIP and secure approval from the EPA.

Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350)

The Clean Energy and Pollution Reduction Act of 2015 establishes a new set of objectives in clean energy, clean air, and pollution reduction for 2030 and beyond. This act requires the amount of electricity generated and sold from renewable energy resources to be increased to 50 percent by December 31, 2030, which is an increase in the state's Renewables Portfolio Standard (RPS) goal of 33 percent by 2020, established by Senate Bill 2 in 2011. In addition, statewide energy efficiency savings in electricity and natural gas must be doubled through energy efficiency and conservation efforts. As with Senate Bill 2, the act requires the California Public Utilities Commission (CPUC) to establish efficiency targets for electric and gas companies that are consistent with the statewide targets. To track RPS compliance, the CPUC's Energy Division has developed an RPS Compliance Report spreadsheet for retail sellers to report their progress in reaching the established targets on an annual basis.

Sulfur Content in Fuel

Pursuant to Title 13, Section 2281 of the California Code of Regulations (CCR), the sulfur content of vehicular diesel fuel sold or supplied in California must not exceed 15 parts per million (ppm) by weight. As stipulated in 17 CCR 93114, non-vehicular diesel fuel is subject to the sulfur limits specified in Title 13, section 2281 of the CCR.

5.3.2.3 Regional and Local

San Diego County Air Pollution Control District

Regional air pollution control districts are primarily responsible for regulating stationary emission sources at industrial and commercial facilities within their jurisdictions and preparing the air quality plans

required under the CAA and CCAA. The SDAPCD is the primary agency responsible for planning, implementing, and enforcing federal and state ambient standards in San Diego County. The plans, rules, and regulations presented in the following subsections apply to all sources under the SDAPCD's jurisdiction.

Air Quality Plans

The SDAPCD's air quality plans collectively provide an overview of the region's air quality and air pollution sources and identify the pollution-control measures needed to attain and maintain AAQS. The SDAPCD's air quality plans include the San Diego Regional Air Quality Strategy (RAQS) and the San Diego portion of the California SIP, which address CAAQS and NAAQS, respectively.

Ozone Air Quality Management Plan

~~The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O₃ NAAQS (per the SIP submitted to the EPA in June 2007). However,~~ The EPA designated San Diego County as a nonattainment area for ~~new the~~ 0.075-ppm 8-hour O₃ ~~NAAQS Standard~~; thus, the SDAPCD submitted ~~an updated~~ a SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS. The RAQS outlines the measures and regulations that control and reduce O₃ precursors such as NO_x and VOCs. The RAQS control measures focus on stationary sources under the SDAPCD's jurisdiction, but also include emission sources and control measures under the jurisdiction of CARB and EPA.

Particulate Matter Air Quality Management Plan

The CCAA does not require local districts to establish air quality management plans for state PM₁₀ nonattainment. However, the SDAPCD prepared a report, *Measures to Reduce Particulate Matter in San Diego County*, to control particulate matter (SDAPCD 2005). The SDAPCD is considering establishing control measures for PM emissions from residential wood combustion and has developed rules for controlling PM from fugitive dust generated at construction sites and unpaved roads.

Regulation IV – Prohibitions, Rule 50 – Visible Emissions

This rule prohibits any activity that will create air contaminant emissions darker than 20 percent opacity for more than an aggregate of three minutes in any single 60-minute time period.

Regulation IV – Prohibitions, Rule 51 – Nuisance

This rule prohibits discharging air contaminants that cause injury or nuisance to the public, endanger public comfort or health and safety, or have the potential to damage a business or property.

Regulation IV – Prohibitions, Rule 55 – Fugitive Dust Control

This rule regulates construction and demolition activities that could generate fugitive dust. It does not apply to permanent, unpaved roads unless undergoing construction or resurfacing. Rule 55 contains guidelines for airborne dust and trackout.

The proposed project is not subject to local discretionary regulations because the CPUC has exclusive jurisdiction over the siting, design, and construction of the proposed project.

City of San Diego General Plan

The City of San Diego General Plan does not outline air quality policies relevant to the proposed project.

City of Del Mar Community Plan

The City of Del Mar's 1976 Community Plan, 1985 amendments, and 2002 resolution do not outline air quality policies relevant to the proposed project.

5.3.3 Environmental Impacts and Assessment

5.3.3.1 Approach to Impact Assessment

Applicant-Proposed Measures

The applicant has not incorporated applicant-proposed measures (APMs) into the proposed project to specifically minimize or avoid impacts on air quality. Instead, SDG&E would implement the following air quality control measures from the Proposed Project Design Features and Ordinary Construction Restrictions described in Chapter 4.0, "Project Description" as a means of reducing air quality impacts relating to fugitive dust, materials transport, equipment emissions and use of volatile organic compounds (VOCs) to levels of insignificance.

- **Fugitive Dust Control.** All unpaved construction areas would be watered, as necessary, during construction to reduce dust emissions and to meet SDAPCD Rule 55 requirements. SDG&E or its contractor would keep the construction area sufficiently dampened to control dust caused by construction and hauling, and would provide at all times reasonable dust control in areas subject to windblown erosion.
- **Bulk Material Transport.** All loads would be secured by covering them or by sufficiently watering and using at least two feet of freeboard to avoid carry-over.
- **Equipment Emissions.** SDG&E or its contractor would maintain and operate construction equipment to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off after 5 minutes when not in use. Construction activities would be phased and scheduled to avoid emission peaks, and equipment use would be curtailed during second-stage smog alerts.
- **VOC Reduction.** Low- and non-VOC-containing coatings, sealants, adhesives, solvents, asphalt, and architectural coatings would be used to reduce VOC emissions.

These control measures are incorporated into California Emissions Estimator Model (CalEEMod) modeling and are presented in Table 5.3-9, under the discussion of criterion (b), below.

Significance Criteria

Table 5.3-6 includes the significance criteria from Appendix G of the CEQA Guidelines' air quality section to evaluate the environmental impacts of the proposed project.

Table 5.3-6 Air Quality Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The SDAPCD has adopted several attainment plans that outline long-term strategies designed to achieve compliance with the NAAQS and CAAQS. The plans applicable to the proposed project are the RAQS and the 8-hour Ozone Attainment Plan described in Section 5.3.2, "Regulatory Setting."

RAQS

The RAQS emission inventories and projections include all sources of VOCs and NO_x. Projections in the RAQS include current control measures and projected population growth. The RAQS is based on San Diego Association of Governments (SANDAG) growth forecasts for the region, and incorporates measures to meet state and federal requirements. Thus, significance of air quality impacts is based, in part, on the degree to which a project does not conflict with SANDAG's growth forecasts. Since construction of the proposed project would not induce population growth, it would not conflict with the implementation of the RAQS.

Further, the proposed project would also involve implementation of the applicable current control measures in the RAQS. A new control measure related to VOCs was adopted and implemented under the RAQS. Non-adherence to the control measure would be a significant impact. The SDAPCD control measure incorporates tighter VOC limits for architectural coatings and would further reduce VOC emissions in San Diego County. Per SDG&E's Proposed Project Design Features and Ordinary Construction Restrictions, low- and non-VOC-containing architectural coatings would be used and adhere to SDAPCD's coating standard in the RAQS.

Therefore, with incorporation of SDG&E's Proposed Project Design Features and Ordinary Construction Restrictions, the project not conflict with RAQS and this impact would be less than significant.

Eight-Hour Ozone Attainment Plan

The 8-hour Ozone Attainment Plan considers that sources of O₃ are regulated at the federal, state, and local levels. Projections in the 8-hour Ozone Attainment Plan are based on "socio-economic projections, industrial and travel activity levels, emission factors, and mission speciation profiles" (SDAPCD 2007). Since the proposed project would not include development of new homes or businesses, it would not induce population growth in the SDAB.

However, construction of the proposed project could conflict with the reasonably available control measures to restrict vehicle idling, which would constitute a significant impact. SDG&E or its contractor(s) would maintain and operate construction equipment to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off after 5 minutes when not in use. Construction activities will be phased and scheduled to avoid emission peaks, and equipment use will be curtailed during second-stage smog alerts.

Furthermore, the types and quantities of construction equipment that would be used for the proposed project would be typical of the industry and would not be of sufficient quantity and intensity to exceed those assumptions used for the analysis of construction equipment emissions in the 8-hour Ozone Attainment Plan. Construction of the proposed project would therefore not conflict with the projections or the emissions control measure in the 8-hour Ozone Attainment Plan. There would be no impact.

Operation of a project could obstruct implementation of RAQS if it resulted in population or employment growth beyond what is allowed for in the plan, neither of which would occur as a result of the proposed project. The proposed project therefore would not conflict with or obstruct implementation of any of the SDAPCD's air quality plans. There would be no impact.

Implementation of the proposed project would not include development of new homes or businesses; therefore, it would not induce population growth in the SDAB. Inspections and routine maintenance of the proposed project are expected to occur with intensity, frequency, and duration similar to existing inspection and maintenance activities. Most vehicles used during operation and maintenance would be crew trucks and would not produce sufficient emissions to exceed those assumptions used in the analysis of equipment emissions in the 8-hour Ozone Attainment Plan. The 8-hour Ozone Attainment Plan has accounted for emissions related to operation and maintenance through consideration of industrial and travel activity levels, and vehicle use would be typical of the industry. Therefore, operation and maintenance would not conflict with the 8-hour Ozone Attainment Plan, and impacts would be less than significant.

Significance: Less than Significant

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

The air quality standards most applicable to the proposed project would be the SDAPCD significance thresholds for stationary sources (pursuant to Rule 20.1, et seq.) (Table 5.3-7). If construction emissions were to exceed stationary source thresholds, construction activities would have the potential to violate air quality standards or contribute substantially to existing violations.

Table 5.3-7 San Diego Air Pollution Control District Significance Thresholds

Pollutants	Construction Threshold (pounds per day)
PM _{2.5}	55
PM ₁₀	100
NO _x	250
SO _x	250
CO	550
VOC	75

Source: SDAPCD 2016

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

NO_x and particulate matter are the primary air pollutants resulting from construction activities. The two greatest sources of these emissions are fugitive dust, vehicles and equipment, and helicopter use. Fugitive dust (i.e., PM₁₀) emissions have the potential to temporarily affect local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with excavation, trenching, and truck travel on unpaved roadways. Fugitive dust emissions can vary from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from construction is expected to be short term and would cease upon completion of construction. In addition, to reduce fugitive dust impacts to the greatest extent possible, the proposed project would incorporate the following air quality control measures from the Proposed Project Design Features and Ordinary Construction Restrictions:

SDAPCD Rule 55 Fugitive Dust Control Requirements. All unpaved construction areas would be watered, as necessary, during construction to reduce dust emissions and to meet SDAPCD Rule 55 requirements. SDG&E or its contractor would keep the construction area sufficiently dampened to control dust caused by construction and hauling, and would provide at all times reasonable dust control in areas subject to windblown erosion.

Exhaust emissions from construction activities include emissions associated with vehicles transporting machinery and supplies to and from the proposed project area, those produced onsite during use of equipment, those resulting from trucks transporting import and export materials, and those resulting from helicopter use. Emitted pollutants would include CO, VOCs, NO_x, PM₁₀, and PM_{2.5}. CalEEMod is used to evaluate construction emissions based on the activities described in Table 4-6 of Section Chapter 4.0, "Project Description." The model calculates the maximum daily emissions for a range of pollutants. The CalEEMod inputs and outputs are provided in an air quality emissions report that was prepared for the

proposed project, as revised to reflect overall emissions, including outputs from anticipated circuit breaker removal and replacement activities at the existing Del Mar Substation (Appendix A).

SDG&E indicates the potential for the use of two types of helicopters, the Kaman K-Max and/or Hughes 500, to facilitate conductor and pole removal in wetland and other sensitive areas where access limitations would preclude the use of ground-based crews, such as within the San Dieguito and Peñasquitos Lagoons. The analysis of construction-period helicopter emissions is based on a conservative assumption that both the Kaman K-Max and the Hughes 500 helicopters would be used in tandem for up to 8 hours per day for 10 days throughout the 12-month construction period. Helicopter emissions are evaluated using an approximation formula for fuel flow and emission factors as cited in the Federal Office of Civil Aviation, *Guidance on the Determination of Helicopter Emissions* (FOCA 2015). Duration of helicopter use (number of days used) and engine types (power mode) associated with both helicopter models factor into the emission profile estimates based on flight hours, included in Tables 5.3-8 and 5.3-9, below. The Air Quality Emissions Report (Appendix A), contains the detailed computation of helicopter emissions estimates.

The CalEEMod modeling outputs indicate that peak unmitigated emissions (without inclusion of those air quality control measures presented in the Proposed Project Design Features and Ordinary Construction Restrictions; see “Approach to Impact Assessment”) would not exceed SDAPCD pollutant thresholds for any of the pollutants evaluated in Table 5.3-8.

Table 5.3-8 Peak Daily Uncontrolled Construction Emissions

Year: 2019						
Emission Source	Emissions (pounds per day)					
	PM _{2.5}	PM ₁₀	NO _x	SO _x	CO	VOCs
Construction Equipment and Vehicles	12.39	58.20	137.44	0.30	116.56	13.67
Helicopter Use ^(a)	1.89	1.89	67.80	31.38	31.92	25.81
Substation Modifications	0.61	0.66	11.45	0.02	8.59	1.13
TOTAL	14.28 14.89	60.09 60.75	205.24 216.69	31.68 31.70	148.48 157.07	39.48 40.61
Threshold	55	100	250	250	550	75
Threshold Exceeded?	No	No	No	No	No	No

Note:

^(a) See Appendix A, “Air Quality Emissions Report” for factors and assumptions contributing to helicopter air quality emission estimates during construction.

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

As discussed under “Applicant-Proposed Measures,” above, air quality control measures and Project Design Features and Ordinary Construction Restrictions are incorporated into CalEEMod modeling with the resulting controlled outputs presented in Table 5.3-9.

Table 5.3-9 Peak Daily Controlled Construction Emissions

Year: 2019						
Emission Source	Emissions (pounds per day)					
	PM _{2.5}	PM ₁₀	NO _x	SO _x	CO	VOCs
Construction Equipment and Vehicles	9.20	26.23	137.44	0.30	116.56	13.67
Helicopter Use ^(a)	1.89	1.89	67.80	31.38	31.92	25.81
Substation Modifications	<u>0.61</u>	<u>0.66</u>	<u>11.45</u>	<u>0.02</u>	<u>8.59</u>	<u>1.13</u>
TOTAL	<u>11.09</u> <u>11.70</u>	<u>28.12</u> <u>28.78</u>	<u>205.24</u> <u>216.69</u>	<u>31.68</u> <u>31.70</u>	<u>148.48</u> <u>157.07</u>	<u>39.48</u> <u>40.61</u>
Threshold	55	100	250	250	550	75
Threshold Exceeded?	No	No	No	No	No	No

Note:

(a) Appendix A, "Air Quality Emissions Report" for factors and assumptions contributing to helicopter air quality emission estimates during construction.

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

As shown in Table 5.3-9, implementation of air quality APMs would affect the PM_{2.5} and PM₁₀ emissions. Incorporation of APMs would result in an approximate 28 21 percent decrease in PM_{2.5} with control measures incorporated into construction; APMs would reduce an approximate additional 46 53 percent of projected PM₁₀ emissions over an uncontrolled scenario. Neither uncontrolled nor controlled emission rates from project construction would exceed applicable SDAPCD thresholds, and therefore, the project would not violate any air quality standard or contribute substantially to existing or projected air quality violations.

The vehicle trips and maintenance activities associated with the proposed project would be similar to the level of vehicle trips and maintenance activities prior to construction of the proposed project. Further, maintenance activities would not involve the use of helicopters. Therefore, there would be no increase in CO, VOCs, NO_x, PM₁₀, or PM_{2.5} compared to existing conditions. In addition, removal of TL666D would reduce future operation and maintenance activities in the area compared to existing conditions. Therefore, project construction and operation would not violate applicable air quality standards, and the impact would be less than significant.

Significance: Less than Significant

c. Would the project 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)?

The project area is in nonattainment for O₃ under both NAAQS and CAAQS, and in nonattainment for O₃, PM₁₀, and PM_{2.5} under CAAQS. Construction of the proposed project would result in emissions of O₃ precursors (CO, VOC, and NO_x) and fugitive dust, as shown in Table 5.3-9. However, the proposed project would not exceed the significance thresholds for O₃ precursors, PM₁₀, or PM_{2.5}, and thus would not

contribute considerably to a significant cumulative impact to O₃, PM₁₀, or PM_{2.5}. The cumulative impact from project emissions of CO, VOC, and NO_x would not be considerable.

In addition, all off-road diesel equipment, on-road heavy-duty diesel trucks, and portable diesel equipment used for the proposed project would meet the state's applicable airborne toxic control measures for control of DPM or NO_x exhaust emissions (e.g., applicable airborne toxic control measures for portable diesel engines, off-road vehicles, and heavy-duty on-road diesel trucks, and five-minute diesel engine idling limits). This would further reduce both O₃ precursor and PM emissions. While less than significant, conformance to SDAPCD Rule 55 requirements by watering all unpaved construction areas, as necessary, during construction to control dust caused by construction and hauling emissions would further reduce fugitive dust emissions that likely contribute to PM₁₀ and PM_{2.5} discharge. Therefore, construction of the proposed project would not contribute to cumulatively considerable increases of any criteria pollutant for which the region is in nonattainment. The vehicle trips and maintenance activities for the proposed project would be comparable to the current level of vehicle trips and maintenance activities. Operation and maintenance activities would be similar to current emissions, and thus impacts would be less than significant.

Significance: Less than Significant

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The proximity of sensitive receptors to any single work area would range from approximately 35 to 355 feet. Furthermore, construction equipment would continuously move throughout the corridor work areas so that no single sensitive receptor would experience persistent exposure to pollutants.

Diesel exhaust would be emitted from heavy equipment during Pole 2 and Pole 3 installation (i.e., grading, work pads, construction foundation) and transport of equipment and personnel, as part of the TL674A Reconfiguration. Jet fuel (a type of aviation fuel designed for use in aircraft powered by gas-turbine engines, generally kerosene-based fuels) exhaust would be emitted from light- and heavy-duty helicopters during the conductor and pole removal process, and the modification process in areas where access limitations would prevent the use of ground-based crews (e.g., San Dieguito and Peñasquitos Lagoons). Residential uses are located as near as 34 feet and schools about 27 feet from the closest project work area. Regarding helicopter use and the potential for exposure to up to 10 days of helicopter use would occur throughout the 12-month construction period. Conservatively, Table 5.3-9, above, illustrates that pollutant concentration emitted from helicopter use during construction would be below applicable SDAPCD thresholds and therefore not anticipated to expose sensitive receptors with considerable pollutant concentrations.

Similarly, diesel exhaust particulate matter would be emitted from heavy equipment during trenching and underground duct bank construction. Residential uses are located as close as 91 feet from underground work areas. However, most residential uses would be located further away from the proposed project's components than that.

The limited duration and limited quantities of equipment at any single work area would ensure that pollutant exposure to any individual receptor would be limited. The use of construction equipment and occasional and limited use of helicopters would not result in excessive emissions concentrations at any one location because the project's specific activities could vary throughout the day, and it is assumed highly unlikely that power tools would remain operational for an entire day. It is assumed that tools would be made operational when needed and turned when not in use. Additionally, the temporal nature of the construction schedule over the 12 month construction period means that work would be conducted in multiple areas simultaneously, with equipment and helicopters would be dispersed throughout the project work area. Equipment and helicopters would continuously move throughout utility corridors depending on the particular activity. Because most pole removal work involving helicopter use at sites in and over open space areas, hundreds or more feet from receptors in residential adjacent residential neighborhoods hovering above where the helicopters' exhaust would disperse and dissipate by the force prevailing wind currents. As such, no single sensitive receptor would experience persistent exposure to pollutants and impacts would be less than significant.

Earthmoving activities and helicopter work associated with pole removal and installation along TL674A and TL666D work areas could produce fugitive dust emissions in sufficient concentrations to be a nuisance for sensitive receptors nearby and result in a significant impact if measures were not implemented to suppress the amount of dust released into the local atmosphere. SDG&E's conformance to SDAPCD Rule 55 requirements by watering construction areas with loose soil and restricting construction activities during high winds would ensure fugitive dust emissions would not be substantial and adverse.

The project's operation and maintenance activities would not expose receptors in the vicinity of project to substantial pollutant concentrations. The utility lines are not stationary pollution sources and any air quality emissions associated with routine maintenance would be from nominal equipment use and mobile sources associated with automobile trips that would transport maintenance crews to the job site. These emissions are expected to be equal to or lesser than the frequency, intensity and duration of those that currently occur. As a result, this impact is considered less than significant.

Significance: Less than Significant

e. Would the project create objectionable odors affecting a substantial number of people?

Construction of the proposed project would generate odors from diesel exhaust emissions that could be a nuisance for residents living directly adjacent to construction work areas. These emissions would be temporary in nature and would be limited by the small number of vehicles at any given site and the distance from any sensitive receptor. In addition, trucks and vehicles in loading and unloading queues would have engines turned off after five minutes when not in use, which would further minimize the generation of odors from diesel exhaust emissions. Therefore, impacts would be less than significant.

Operation and maintenance activities would not generate any significant sources of odor causing pollutants beyond baseline conditions, and there would be no operational odor impacts associated with the proposed project.

1 **Significance: Less than Significant**

2
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5.4 Biological Resources

5.4.1 Approach to Data Collection

Literature and Database Review

Information on biological resources within and surrounding the project area was gathered through desktop analyses and field surveys conducted by the applicant and its biological consultants. Survey results for the proposed project were reported in the Biological Technical Report (AECOM 2017), provided by the applicant. The full survey reports can be viewed in Appendix B.

San Diego Gas & Electric Company (SDG&E) conducted a search of the following literature sources to develop their initial environmental analysis of potential biological resources in the project area:

- An April 2016 California Natural Diversity Database (CNDDDB) search for special status species occurrences and sensitive natural communities located within 1 mile of the project area, clipped to the low tide line;
- The California Native Plant Society's Inventory of Rare, Threatened, and Endangered Plants of California;
- The U.S. Fish and Wildlife Service's (USFWS's) species occurrence and critical habitat database; and
- Reports from studies conducted for the proposed project by RECON and Konecny Biological Services, Inc.

The California Public Utilities Commission (CPUC) reviewed the results of the applicant's analysis and surveys to determine the potential for impacts to biological resources associated with the proposed project.

Survey Methodology and Coverage

Table 5.4-1 describes the preliminary surveys conducted by the applicant within the Biological Survey Area (BSA), an approximately 8-mile-long existing utility corridor with a 150-foot-wide buffer along either side of the center line of linear proposed project features, and a 100-foot-wide buffer surrounding non-linear proposed project features. In total, the BSA totaled approximately 325 acres. Full survey reports and results are included in Appendix B.

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Table 5.4-1 Surveys Conducted for the Proposed Project

Survey Report and Focus	Date	Method	Location	Results Summary
Aquatic Resources Survey (see Appendix B)	August 2013	USACE Wetland Delineation Manual (USACE 1987), Arid West Regional Delineation Supplement (USACE 2008), dominant vegetation species' Wetland Indicator Status (USACE 2012), "one parameter definition" in accordance with the CCC for CCC-jurisdictional wetlands (14 CCR Section 13577), Section 30107.5 of the California Coastal Act.	The transmission line right-of-way 50 feet on either side of the transmission centerline, and potential site access routes within San Dieguito Lagoon and Los Peñasquitos Lagoon.	34 hydrologic features were identified during surveys. 28 of the identified features are likely to fall under the jurisdiction of USACE, CDFW, RWQCB, and/or CCC.
Jurisdictional Waters Assessment (see Appendix B)	2016–2017	Field validation and verification of data collected during prior 2013 Aquatic Resources Survey.	Boundaries of all previously-mapped polygons identified in the 2013 Aquatic Resources Survey, and an additional approximately 6 acres of waters that were located outside of the original 2013 survey area but within the BSA.	Jurisdictional waters boundaries were verified and adjusted where required, and an additional 6 acres of waters were mapped within the BSA. Features identified to be potentially jurisdictional are likely to fall under the jurisdiction of USACE, CDFW, RWQCB, and/or CCC.
Biological Constraints General Wildlife Survey (see Appendix B)	September–October 2013	Biologists walked the survey area and potential site access routes. Inaccessible locations were observed remotely with binoculars, aerial imagery, and soil survey maps.	The 100-foot-wide transmission corridor with a minimum 50-foot buffer around each project feature (transmission poles, vaults, hand holes, guard structures, stringing sites, staging areas, and helicopter fly yards).	One special status plant species (Del Mar manzanita [<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>]), and three special status wildlife species (salt marsh/wandering skipper [<i>Panoquina errans</i>], Coastal California Gnatcatcher, and Belding's Savannah Sparrow) were observed within the study area.
Rare Plants Survey (see Appendix B)	March–July 2014	Biologists compiled data pertaining to potentially occurring rare plant species (habitat preferences, soil types, vegetation maps, and known phenologies). In order to increase the detectability of rare plant species that are especially cryptic and/or have seasonally restricted blooming phenologies were selected as reference populations and checked periodically. Observed reference population conditions were incorporated into focused plant survey methods to ensure appropriate survey timing.	The 100-foot-wide transmission corridor centered on an approximately 7-mile stretch of TL674A and TL666D, with a minimum 50-foot buffer around each project feature (transmission poles, vaults, hand holes, guard structures, stringing sites, staging areas, and helicopter fly yards), and potential site access routes within San Dieguito Lagoon and Los Peñasquitos Lagoon.	17 rare plants were observed during surveys, including FE Del Mar manzanita.
Rare Plants Survey (see Appendix B)	September 2016, March 2017	Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants (USFWS 2000) and Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009) and California Native Plant Society Botanical Survey Guidelines (CNPS 2001).	All areas within the BSA with suitable habitat for rare plants	15 special status plant species were detected within the BSA, including FE Del Mar manzanita.
Light-footed Clapper (Ridgeway's) Rail (<i>Rallus longirostris levipes</i>) (see Appendix B)	March–May 2014	USFWS recommended methods.	Survey areas included the San Dieguito site (the western portion of San Dieguito Lagoon immediately north of Racetrack Drive within Del Mar and San Diego), and the Los Peñasquitos site (south of Carmel Valley Road, extending 4,200 feet southeast to the Sorrento Valley pump station). The surveys were conducted by walking the project alignment and an approximate 150-foot buffer, stopping at areas of suitable habitat.	No Light-Footed Ridgeway's Rail were observed in the San Dieguito Site, though there was fragmented habitat within the San Dieguito River that is being restored. Two pairs of Light-Footed Ridgeway's Rail were observed at the Los Peñasquitos site.
Belding's Savannah Sparrow (<i>Passerculus sandwichensis beldingi</i>) (see Appendix B)	March–May 2014	Biologists conducted six surveys concurrently with Light-Footed Ridgway's Rail surveys, in accordance with recommendations provided to USFWS.	Survey areas included the San Dieguito site (the western portion of San Dieguito Lagoon immediately north of Racetrack Drive within Del Mar and San Diego), and the Los Peñasquitos site (south of Carmel Valley Road, extending 4,200 feet southeast to the Sorrento Valley pump station). There are approximately 33 acres of suitable habitat for this species within the BSA. The surveys were conducted by walking the project alignment and an approximate 150-foot buffer, stopping at areas of suitable habitat.	At least 13 Belding's Savannah Sparrow territories were observed in the southern coastal salt marsh along Racetrack Drive. Belding's Savannah Sparrow was observed south of the staging area near the Los Peñasquitos site. Fifteen Belding's Savannah Sparrow territories were observed within coastal salt marsh habitat in the San Dieguito site, and four territories were observed immediately adjacent to the BSA.
Western Snowy Plover (<i>Charadrius alexandrinus nivosus</i>) (see Appendix B)	March–July 2014	USFWS recommended methods	Survey areas included the San Dieguito site (the western portion of San Dieguito Lagoon immediately north of Racetrack Drive within Del Mar and San Diego), and the Los Peñasquitos site (south of Carmel Valley Road, extending 4,200 feet southeast to the Sorrento Valley pump station). The surveys were conducted by walking the project alignment and an approximate 150-foot buffer, stopping at areas of suitable habitat.	Western Snowy Plover was not observed at either site.

Table 5.4-1 Surveys Conducted for the Proposed Project

Survey Report and Focus	Date	Method	Location	Results Summary
California Least Tern (<i>Sterna antillarum browni</i>) (see Appendix B)	April–July 2014	USFWS recommended methods	Survey areas included 7.6 acres of suitable habitat within the San Dieguito site (the western portion of San Dieguito Lagoon immediately north of Racetrack Drive within Del Mar and San Diego), and the Los Peñasquitos site (south of Carmel Valley Road, extending 4,200 feet southeast to the Sorrento Valley pump station). Of the 7.6 acres, 1.9 acres occurred within the BSA. The surveys were conducted by walking the project alignment and an approximate 150-foot buffer, stopping at areas of suitable habitat.	California Least Tern was observed foraging in open water at the San Dieguito site, but was not observed at the Los Peñasquitos site.
Light-footed Ridgway's Rail (see Appendix B)	February–April 2017	USFWS recommended methods	Surveys were conducted in portions of the BSA (150 feet on either side of the proposed project alignment) that contained suitable habitat for Light-Footed Ridgway's Rail. Suitable habitat occurs within Los Peñasquitos Lagoon south of Carmel Valley Road, east of the railroad tracks and west of I-5 and Sorrento Valley Road ("Los Peñasquitos Site") and within San Dieguito Lagoon paralleling Jimmy Durante Boulevard, west of I-5, and immediately north of Racetrack View Drive ("San Dieguito Site").	Five Light-Footed Ridgway's Rail territories were observed within the BSA in the southern portion of Los Peñasquitos Lagoon in freshwater marsh habitat, with an additional territory observed adjacent to the BSA. No Light-Footed Ridgway's Rail territories or individuals were observed at the San Dieguito site, though suitable habitat is present and one individual was observed approximately 400 feet east of the BSA.
Belding's Savannah Sparrow (see Appendix B)	February–April 2017	Biologists conducted four surveys concurrently with Light-Footed Ridgway's Rail surveys, following USFWS-recommended survey methods, and two surveys independently. All surveys were conducted by a biologist with an appropriate CDFW Memorandum of Understanding.	Surveys were conducted in portions of the BSA (150 feet on either side of the proposed project alignment) that contained suitable habitat for Belding's Savannah Sparrow. Suitable habitat occurs within Los Peñasquitos Lagoon south of Carmel Valley Road, east of the railroad tracks and west of I-5 and Sorrento Valley Road ("Los Peñasquitos Site") and within San Dieguito Lagoon paralleling Jimmy Durante Boulevard, west of I-5, and immediately north of Racetrack View Drive ("San Dieguito Site").	Four Belding's Savannah Sparrow territories were observed in southern coastal saltmarsh habitat at the Los Peñasquitos site, and four individual singing males were observed within the northern portion of Los Peñasquitos lagoon. One Belding's Savannah Sparrow was observed within coastal salt marsh habitat immediately outside of the BSA near the Torrey Pines Fly Yard.
Least Bell's Vireo (<i>Vireo bellii pusillus</i>) and Coastal California Gnatcatcher (<i>Poliophtila californica californica</i>) (see Appendix B)	April–July 2014	USFWS protocol-level surveys	1.3 acres of suitable Least Bell's Vireo habitat (0.2 acres within the BSA) and 60.4 acres of suitable Coastal California Gnatcatcher habitat (26 acres within the BSA) occurring within a 300-foot-wide buffer surrounding the 7-mile transmission corridor and project components	No Least Bell's Vireo individuals were observed within the survey area. Six Coastal California Gnatcatcher use areas, and multiple individual Coastal California Gnatcatchers and one fledgling were observed within the survey area. An additional two Gnatcatcher use areas were observed immediately adjacent to the BSA. Coastal California Gnatcatchers and Gnatcatcher use areas were observed north of Via de la Valle, between Sorrento Valley Road and I-5, east of Old el Camino Real, and between the Torrey Pines Fly Yard and North TorreyPines Road.
Coastal California Gnatcatcher (see Appendix B)	March–May 2017	USFWS protocol-level surveys	26.02 acres of suitable habitat within the BSA	Six Coastal California Gnatcatcher pairs were observed during surveys (three pairs within the BSA and three pairs within 100 feet of the BSA). Three pairs were observed north of Via de la Valle, one within Torrey Pines State Natural Reserve Extension, one immediately north of Portofino Drive, and one between Portofino Drive and Carmel Valley Road.
Pacific Pocket Mouse (<i>Perognathus longimembris pacificus</i>) (see Appendix B)	June 2014	USFWS protocol-level surveys	Areas of suitable Pacific pocket mouse habitat that overlap with potential project-related ground disturbance (stringing sites, staging areas, guard structures, and pole replacement sites), and within all areas identified as suitable habitat during the biological constraints study.	No Pacific pocket mice or signs such as scat were observed. Some burrows observed had the potential to support Pacific pocket mice, but the burrows were generally larger than those used by Pacific pocket mice. This species has not been observed south of Camp Pendleton within San Diego County since 1932, though signs of general small mammal activity were observed during surveys.

Table 5.4-1 Surveys Conducted for the Proposed Project

Survey Report and Focus	Date	Method	Location	Results Summary
Wandering Skipper (<i>Panoquina errans</i>) (see Appendix B)	July–September 2014	Biologists conducted a preliminary site visit to an invertebrate collection to observe hundreds of specimens of the target species and other similar skipper species. Biologists conducted focused transect surveys for wandering skipper and its host plant during breeding season (May–September) within all potentially suitable habitat within the survey area during the typical peak flight period in temperatures greater than 70 degree Fahrenheit and sustained winds below 10 miles per hour, and when other butterfly species were observed flying.	Approximately 158 acres of suitable habitat surrounding within the 100-foot-wide transmission corridor surrounding the approximately 7-mile project area, and surrounding proposed project features and workspaces (transmission poles, vaults, handholes, guard structures, stringing sites, staging areas, and helicopter fly yards). 76.4 of the 158 acres of suitable habitat were within the BSA.	At least 40 wandering skippers were observed. Salt grass—the wandering skipper host plant—was observed throughout the survey area.
Wandering Skipper (see Appendix B)	June–September 2017	A biologist conducted a preliminary literature review to evaluate insect resources for the survey area. The biologist conducted five field surveys during flight season, during daytime hours, evaluating presence of wandering skipper and suitable habitat supporting its larval host plant (saltgrass).	Suitable habitat within the BSA	A total of 23 adult wandering skippers (15 male, 6 female, 2 undetermined) were observed across three of the five survey periods, between late July through late August. No wandering skipper were observed in June or September surveys.

Source: AECOM 2017; Bruyea Biological Consulting 2017
Key:
BSA = Biological Survey Area
CCC = California Coastal Commission
CDFW = California Department of Fish and Wildlife
FE = Federally Endangered
RWQCB = Regional Water Quality Control Board
USFWS = U.S. Fish and Wildlife Service
USACE = U.S. Army Corps of Engineers

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5.4.2 Regional Setting

Components of the proposed project would be constructed within or would cross sections of southern Del Mar and northwestern San Diego, California, as discussed in Chapter 4.0, “Project Description,” and as shown in Figure 4-2. The proposed project would cross several roads and run parallel to Interstate 5 (I-5) in some areas. Project activities would occur between the existing Del Mar Substation and an existing underground line along Vista Sorrento Parkway, immediately south of Pacific Plaza Drive. Activities associated with proposed project construction would occur within San Dieguito Lagoon; Los Peñasquitos Lagoon, including the areas within Torrey Pines State Natural Reserve; and Torrey Pines State Natural Reserve Extension. These areas have a high potential to support sensitive biological resources.

The proposed project would be located within the Peninsular Ranges geomorphic province of the South Coast Floristic Province (UC Berkeley 2017) and is located within the Del Mar and La Jolla USGS 7.5’ quadrangles (UCSB n.d.). It is entirely within the Coastal Zone, is near sea level, would span the San Dieguito and Peñasquitos Hydrologic Units, and would cross several major aquatic features, including the San Dieguito River, San Dieguito Lagoon, and Los Peñasquitos Marsh.

5.4.3 Local Setting

5.4.3.1 Sensitive Natural Communities

Vegetation communities within the BSA, described below, were identified and mapped during habitat assessments and confirmed using a CNDDDB search (Table 5.4-2 and Figure 5.4-1) (AECOM 2017; CDFW 2017; CDFW 2018a). San Diego Association of Governments data was used to supplement 5.1 acres of natural communities data within the BSA that was missing from other sources (SANDAG 2012). Preliminary surveys identified an approximately 325-acre BSA, based on a 150-foot buffer surrounding linear project features, and a 100-foot buffer surrounding non-linear project features and workspaces, not including access roads or footpaths. To ensure a consistent evaluation of natural communities surrounding all proposed project features and work areas, the analysis in this report also considered access roads and footpaths to be linear features that are subject to a 150-foot buffer. The updated BSA used in this analysis is therefore a total of 448.3 acres. Vegetation community descriptions are from Oberbauer et al. 2008. Vegetation communities that are sensitive according to the California Department of Fish and Wildlife (CDFW) (CDFW 2010), which ranks vegetation communities using the thresholds defined by the NatureServ Heritage Methodology (CDFG 2010), or that are listed as Tier I or Tier II species in the City of San Diego Biology Guidelines and County of San Diego Biological Mitigation Ordinance (City of San Diego 2012; County of San Diego 2010), are considered sensitive communities in this analysis.

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Table 5.4-2 Vegetation Communities in the BSA and in Proposed Project Work Areas

Vegetation Community (Holland Natural Community Type)	Characteristics (from Oberbauer et al. 2008)	Ranking (if Sensitive) and Tier	Acres in the BSA	Acres in Project Work Areas
Upland			77.2	0.9
Eucalyptus Woodland (Oberbauer Code 79100)	A non-native, eucalyptus-dominated woodland community that generally forms a closed canopy with little-to-no understory, occasionally supporting scattered individual eucalyptus above a dense herbaceous understory. This community is characterized by dense leaf and bark litter, preventing the success of understory species.	-- / Tier IV	0.5	<0.1
Non-Native Grassland (Oberbauer Code 42200)	Generally occurs on fine-textured, clay, and occasionally waterlogged (during winter) soils below 3,000 feet in elevation. Characterized by dense or sparse annual grasses and forbs up to 3 feet high. In San Diego County, this community often contains oat and brome species. Germination occurs after late fall rains, with growth and flowering in winter through spring. Vegetation dies during the summer, remaining dormant as seeds.	-- / Tier III	0.1	None
Torrey Pine Forest (Oberbauer Code 83140)	Open to moderately dense torrey pine-dominated forest. When sheltered, canopies can reach up to 65 feet, but canopy height is stunted when exposed to wind. Understories can be fully open on dry, sandstone rock substrates with heavy needle accumulation, or be heavily dominated by chaparral vegetation on mesic soils. Favors sites of low precipitation, but is often associated with seasonal fog. Often coexists with Southern Mixed Chaparral. There is a known natural stand of Torrey Pine Forest near the City of Del Mar and Torrey Pines State Reserve.	S1 / Tier I	8.7	0.2
Scrub Oak Chaparral (Oberbauer Code 37900)	A dense, wooded chaparral community up to 20 feet tall, dominated by Nuttal's scrub oak and occasionally inland scrub oak. Generally associated with mesic soils and regularly occurs on slopes.	S3 / Tier I	5.2	0.2
Southern Maritime Chaparral (Oberbauer Code 37C30)	An open chaparral community dominated by wart-stemmed ceanothus and Del Mar Manzanita (<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>). Occurs on sandy substrates in areas with coastal fog. Restricted to coastal areas in San Diego County, including Torrey Pines State Reserve and sites along the San Dieguito River Valley.	S1 / Tier I	17.3	0.2
Southern Mixed Chaparral (Oberbauer Code 37120)	A shrub community 5–10 feet in height, with an open understory, often with visible soil patches. In San Diego County, it is dominated by lilacs (<i>Ceanothus</i> spp.), including lakeside ceanothus. It occurs on the northern sides of dry, rocky, slopes, Nuttal's scrub-oak is known to occupy this community. This community is known to provide suitable habitat for Belding's orange-throated whiptail (<i>Aspidoscelis hyperythra beldingi</i>) and San Diego desert woodrat.	S3 / Tier III	14.8	0.1
Diegan Coastal Sage Scrub (Oberbauer Code 32500)	Dominated by low (up to 3 feet tall), woody, drought-deciduous shrubs in dry, often clay-rich soils on steep slopes. Succulent species occasionally present. Dominant species include California sagebrush, California buckwheat. <i>Baccharis</i> -dominated Diegan Coastal Sage Scrub communities often support saltbush (<i>Atriplex</i> spp.). This community supports Coastal California Gnatcatcher, and can provide habitat for coastal whiptail, Coastal Cactus Wren, and Southern California Rufous-Crowned Sparrow (<i>Aimophila ruficeps canescens</i>).	S3 / Tier II	30.4	0.2
Valley and Foothill Grassland (Oberbauer Code 42000)	A broad grassland community that can support both native and non-native grass and forb species in dense to sparse populations.	-- / Tier I	0.2	None
Riparian, Marsh, Wetlands, and Aquatic			83.8	5.6
Southern Arroyo Willow Riparian Forest (Oberbauer Code 61320)	Winter-deciduous, closed-canopy riparian forest dominated by moderately tall, broadleaf trees, especially arroyo willow (<i>Salix lasiolepis</i>). Understory usually dominated by shrubby willows. Occurs along consistently wet streams, riparian features, and floodplains. Often supports mulefat (<i>Baccharis salicifolia</i>).	S2 / Tier I	0.9	<0.1
Coastal and Valley Freshwater Marsh (Oberbauer Code 52410)	Densely populated by tall (12–16 feet), emergent, perennial aquatic plant species (i.e., cattails, sedges, reeds, spikerushes, and bulrushes), with some low-lying mugwort and pennywort. Occur in peaty substrates in sources of year-round, calm fresh water, often in coastal valleys near rivers, lakes, springs, and streams. Supports Least Bell's Vireo (<i>Vireo bellii pusillus</i>), Least Bittern (<i>Ixobrychus exilis</i>), and Northern Harrier (<i>Circus cyaneus</i>).	S2 / Tier I	13.2	0.8
Coastal Salt Marsh (Oberbauer Code 52100) including Southern Coastal Salt Marsh (Oberbauer Code 52120)	Southern Coastal Salt Marsh, a type of Salt Marsh community, occurs in bays, lagoons, and estuaries in coastal San Diego County and supports woody-stemmed species including seablite and willows (especially <i>Atriplex watsonii</i>), and Alkali heath.	S2 / Tier I	40.7	4.1
Emergent Wetland (Freshwater Marsh) (Oberbauer Code 52440)	Wetlands often occurring in previously disturbed areas where other wetland communities are not yet fully established. Common in floodplains, riversides and lakeshores, these communities can occupy freshwater or alkali wetlands throughout San Diego County, and are dominated by low-growing perennial vegetation such as sedges, rushes, spikerushes, bur-reed, and a number of other water-tolerant plants.	-- / Tier I	2.3	None

Table 5.4-2 Vegetation Communities in the BSA and in Proposed Project Work Areas

Vegetation Community (Holland Natural Community Type)	Characteristics (from Oberbauer et al. 2008)	Ranking (if Sensitive) and Tier	Acres in the BSA	Acres in Project Work Areas
Open Water, Saltpan/Mudflats, Beaches (Oberbauer Codes 64100-64400)	Open water is a broad vegetation community categorization that contains multiple vegetation communities, including: <ul style="list-style-type: none">• Estuarine communities (Oberbauer Code 64130), which are characterized by periodically or permanently flooded coastal areas often near rivermouths, offering varied salinity due to the influx of flowing freshwater from riparian features;• Freshwater (Oberbauer Code 64140)• Saltpan/Mudflats (Oberbauer Code 64300) which are characterized by dry land areas with surface salt or mineral deposits resulting from evaporated water. Flooded saltpans pool water during rain, tidal, and flood events, forming mudflats. Mudflats are coastal wetlands that form when mud is deposited by the tides or rivers, and are common in protected bays, estuaries, and lagoons. For a majority of the time, saltpans are expanses of ground covered in salt or other minerals formed from evaporated water. Saltpans generally pool water when it rains, forming mudflats.• Beaches (Oberbauer Code 64400, which provide sandy substrates along lagoons, lakes, or coastal shorelines, but generally lack vegetation except for sparse herbaceous aquatic species such as seagrass;	-- / --	26.7	0.7
Non-Jurisdictional Features – Brown Ditch & Disspiator, Erosional Features (no Oberbauer Code)	Aquatic features such as drainages, ditches, and erosional areas that are not determined to be jurisdictional wetlands under the United States Army Corps of Engineers (USACE).	-- / --	<0.1	<0.1
Other Land Cover Types			287.3	19.9
Bare Ground (no Oberbauer Code)	Soil not covered by any vegetation, lichen, leaf/plant litter, gravel, or rocks.	-- / Tier IV	0.1	<0.1
General Agriculture (Oberbauer Code 18000)	Lands that support active agricultural operations (artificially irrigated orchard/vineyard habitat, intensive agriculture including dairies and poultry ranches, pastures, and row crops)	-- / Tier IV	2.0	
Disturbed Habitat (Oberbauer Code 11300)	Predominantly non-native, introduced species (i.e., forbs, thistle, and some grasses) that thrive in disturbed areas (i.e., graded areas, regularly cleared sites, staging areas, and off-road vehicle trails). No longer recognizable as native vegetative communities, but continue to support vegetation on soil. Generally do not provide long-term wildlife habitat. Disturbed habitat can provide suitable foraging sites for Cooper's Hawk (<i>Accipter cooperi</i>).	-- / Tier IV	62.2	8.5
Urban/Developed (Oberbauer Code 12000)	Thoroughly developed and altered areas that can no longer support native vegetation. This landscape features permanent structures, pavement, concrete, and non-native areas requiring full irrigation, such as areas featuring ornamental vegetation. Though non-native, this community can provide suitable habitat for Cooper's Hawk and American Peregrine Falcon (<i>Falco peregrinus anatum</i>).	-- / --	207.4	11.4
Landscape/Ornamental (Oberbauer Code 12000)	See "Urban/Developed"	-- / Tier IV	15.6	<0.1
Total acres			448.3	28.2

Sources: CDFW 2010; CDFG 2010; NatureServe 2017; Oberbauer 2008; County of San Diego 2010; City of San Diego 2012

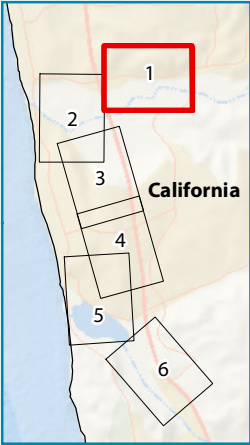
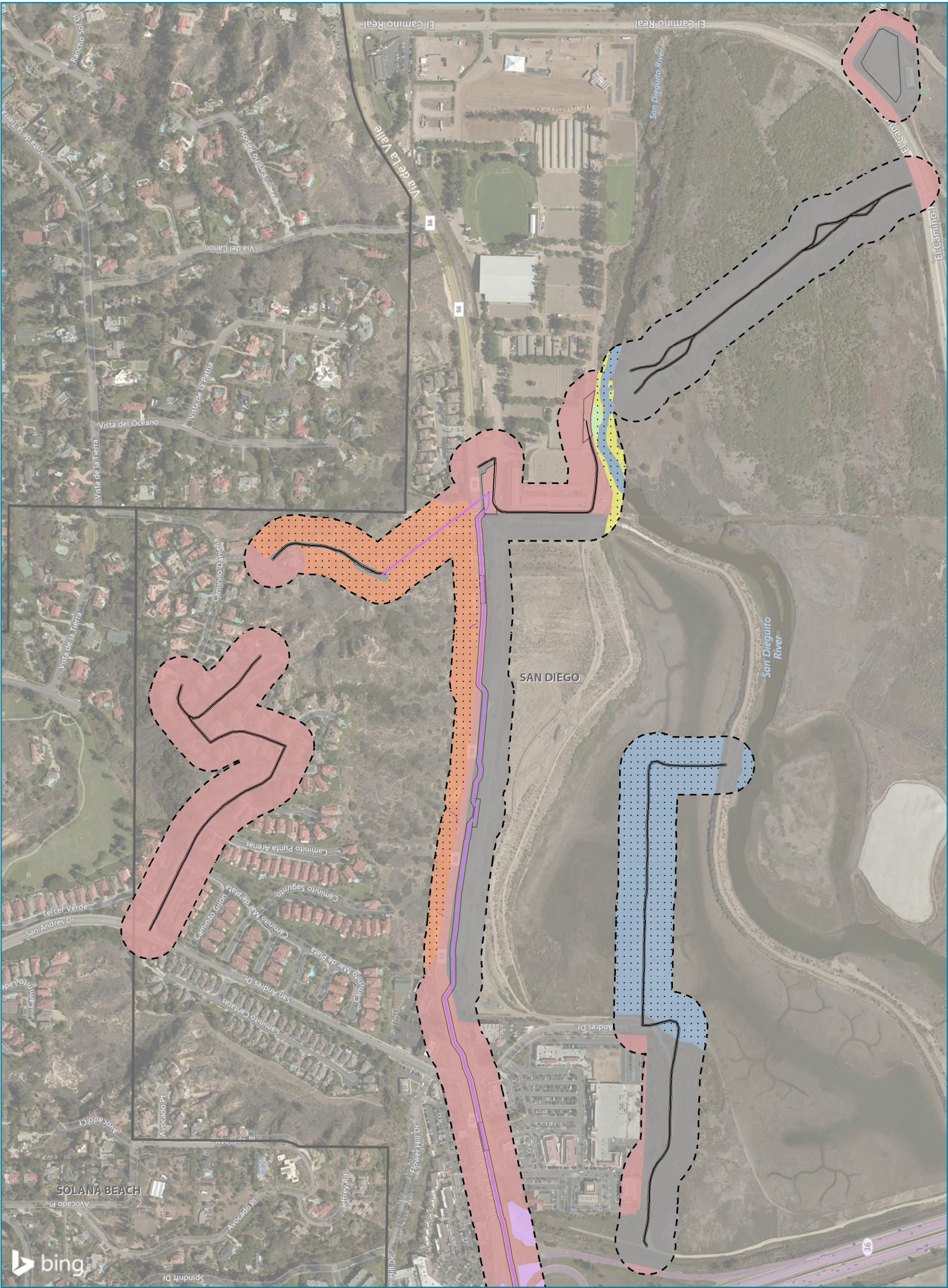
Note: For the purpose of this analysis, vegetation communities receiving the following state risk ranking in accordance with the NatureServe Heritage Methodology were determined to be sensitive (NatureServe 2017):

S1 Critically Imperiled: Critically imperiled in California because of extreme rarity (often five or fewer occurrences) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.

S2 Imperiled: Imperiled in California because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or state.

S3 Vulnerable: Vulnerable in California due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to other factors.

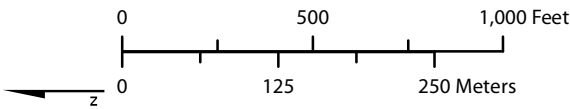
The recommended mitigation ratios for impacted acres of Tier I, Tier II, and Tier III natural communities can be found in Appendix K of the County of San Diego Biological Mitigation Ordinance (County of San Diego 2010).

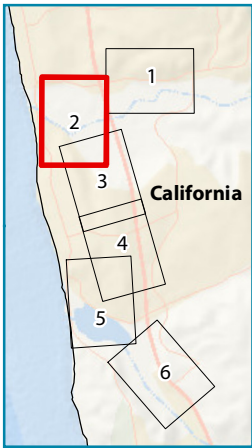
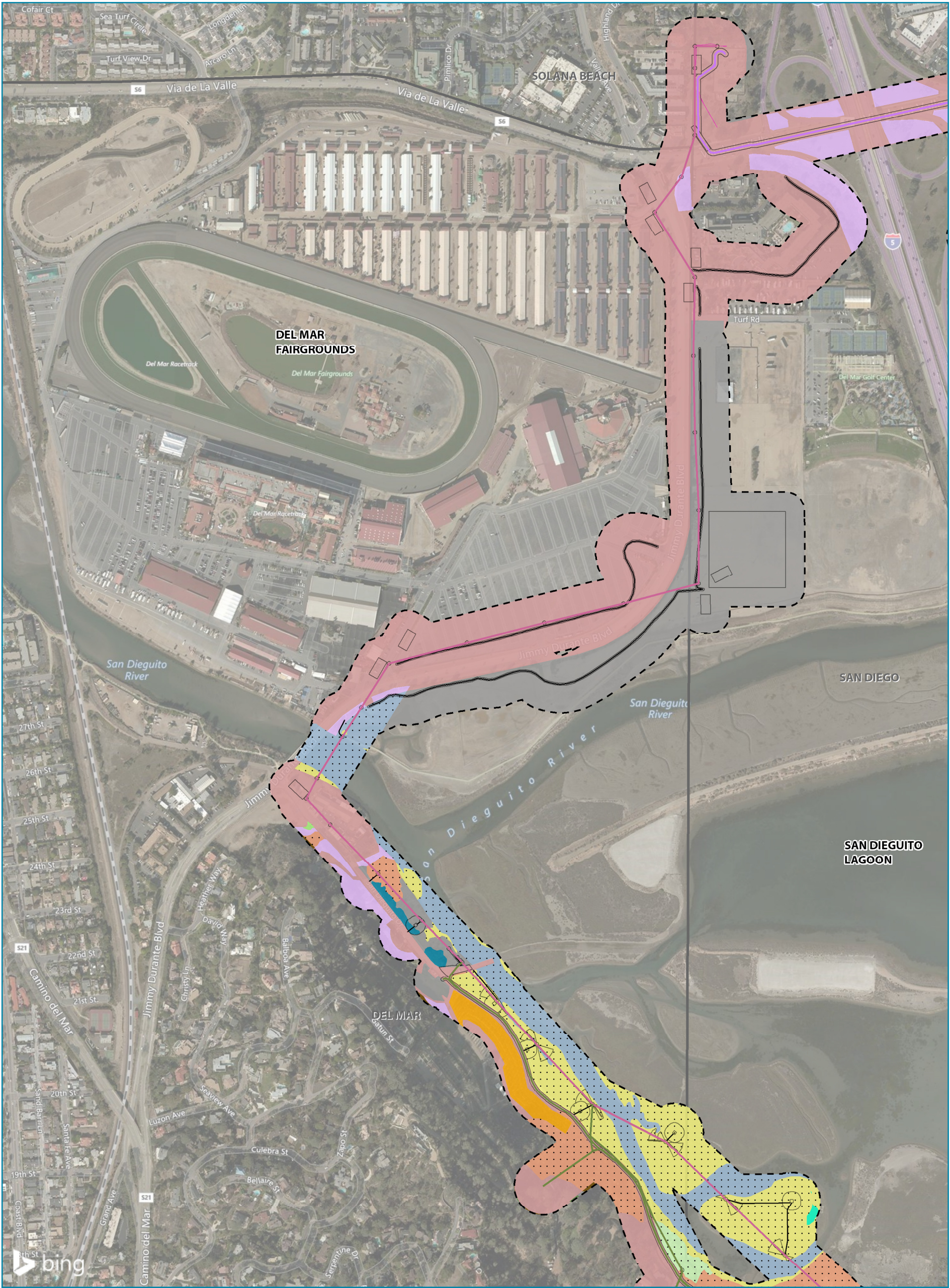


- | | |
|--|-----------------------------|
| ESHAs | Southern Maritime Chaparral |
| Natural Communities | Southern Mixed Chaparral |
| Bare Ground | Landscape/Ornamental |
| Coastal Salt Marsh/Southern Coastal Salt Marsh | Urban/Developed |
| Diegan Coastal Sage Scrub | Proposed Project Components |
| Disturbed Habitat | TL674A Reconfiguration |
| Non-Jurisdictional Features | Workspace Boundary |
| Non-Native Grassland | Access Road |
| Open Water, Saltpan/Mudflats, Beaches | BSA |
| Southern Arroyo Willow Riparian Forest | Jurisdictional Boundary |

Figure 5.4-1
Natural Communities and ESHAs
in the BSA for the
TL 674A Reconfiguration
and TL666D Removal Project
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San Diego County, California

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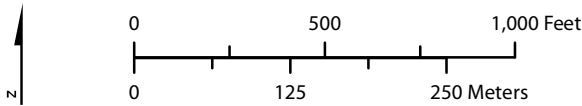


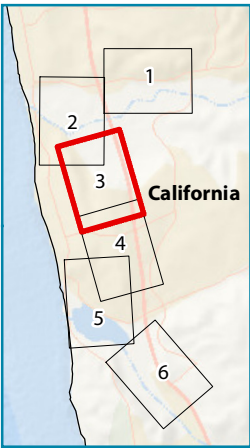
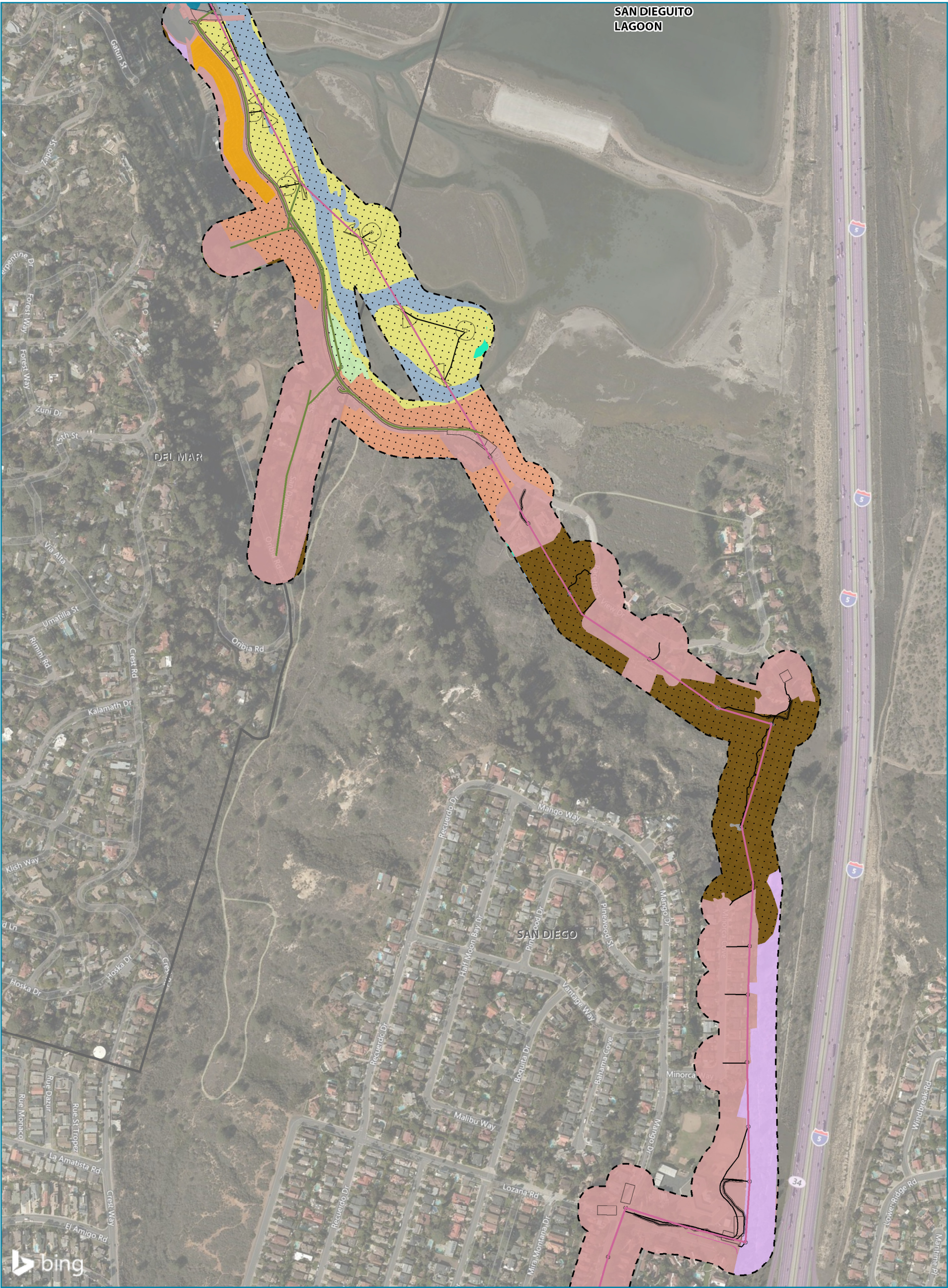


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|--|-----------------------------|
| ESHA | Southern Mixed Chaparral |
| Natural Communities | Torrey Pine Forest |
| Coastal Salt Marsh/Southern Coastal Salt Marsh | Landscape/Ornamental |
| Coastal and Valley Freshwater Marsh | Urban/Developed |
| Diegan Coastal Sage Scrub | Proposed Project Components |
| Disturbed Habitat | C510 Conversion |
| Eucalyptus Woodland | TL666D Removal |
| General Agriculture | TL674A Reconfiguration |
| Non-Jurisdictional Features | Workspace Boundary |
| Non-Native Grassland | Access Road |
| Open Water, Saltpan/Mudflats, Beaches | BSA |
| Southern Arroyo Willow Riparian Forest | Jurisdictional Boundary |

Figure 5.4-1
Natural Communities and ESHAs
in the BSA for the
TL 674A Reconfiguration
and TL666D Removal Project
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San Diego County, California

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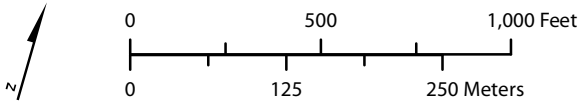




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| ... | ESHAs | | Southern Mixed Chaparral |
| | Natural Communities | | Torrey Pine Forest |
| | Coastal Salt Marsh/Southern Coastal Salt Marsh | | Landscape/Ornamental |
| | Diegan Coastal Sage Scrub | | Urban/Developed |
| | Disturbed Habitat | | Proposed Project Components |
| | Eucalyptus Woodland | | C510 Conversion |
| | General Agriculture | | TL666D Removal |
| | Non-Jurisdictional Features | | Workspace Boundary |
| | Non-Native Grassland | | Access Road |
| | Open Water, Saltpan/Mudflats, Beaches | | BSA |
| | Southern Arroyo Willow Riparian Forest | | Jurisdictional Boundary |
| | Southern Maritime Chaparral | | |

Figure 5.4-1
Natural Communities and ESHAs
in the BSA for the
TL 674A Reconfiguration
and TL666D Removal Project
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San Diego County, California

June 2018



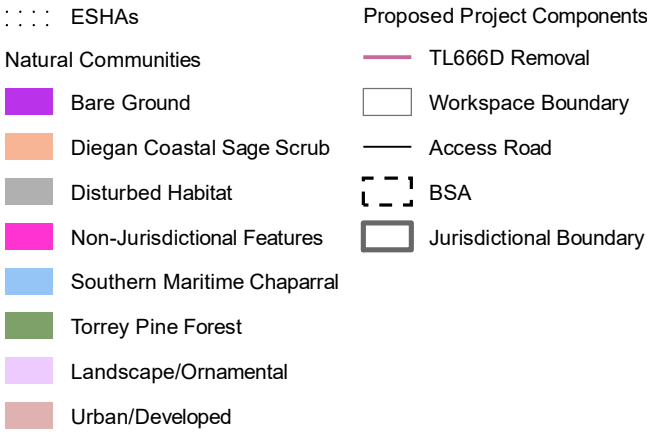
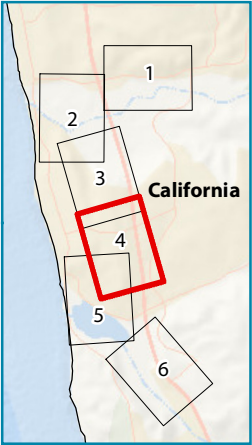
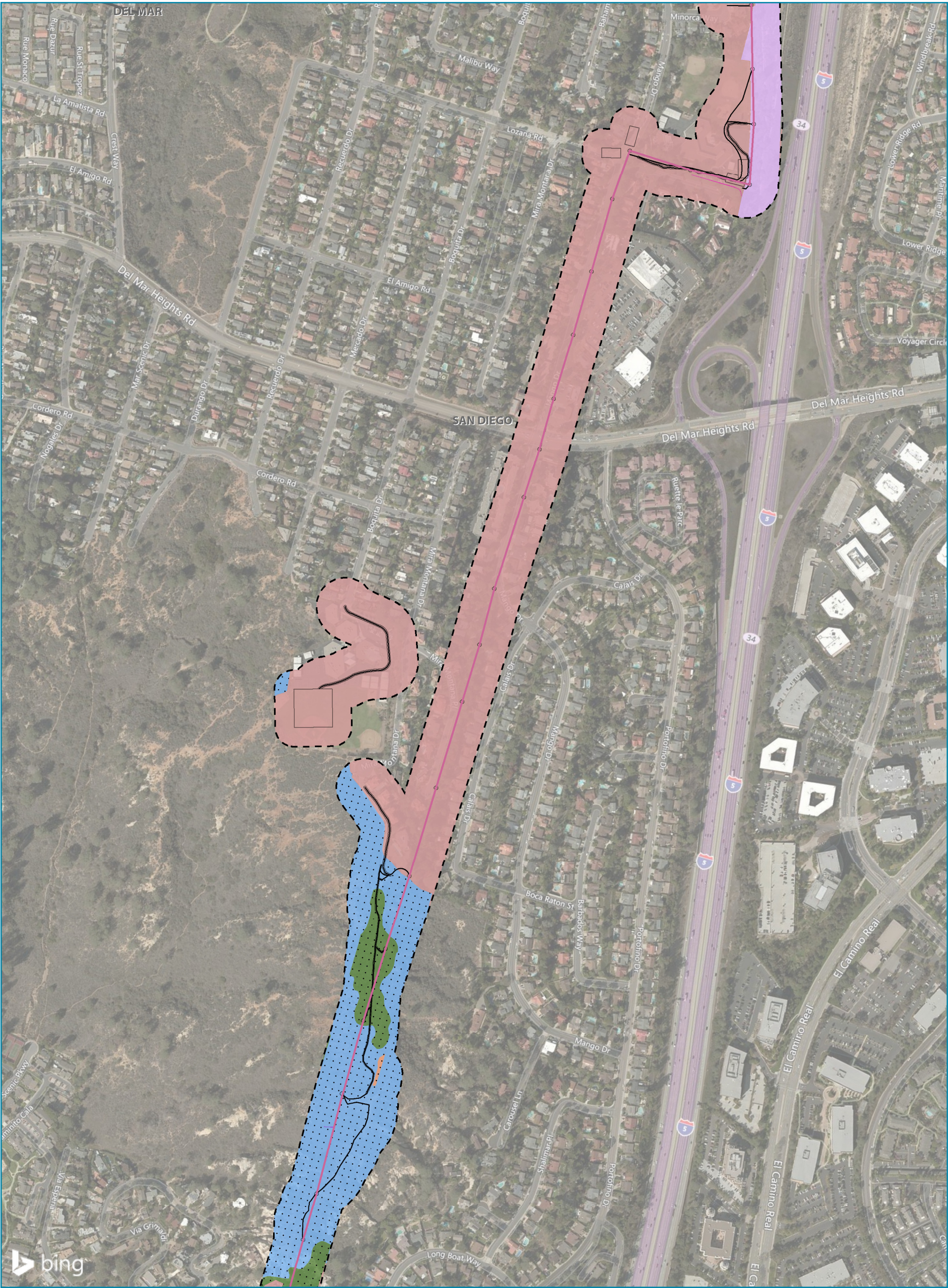
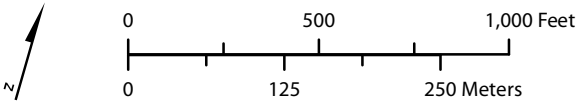


Figure 5.4-1
Natural Communities and ESHAs
in the BSA for the
TL 674A Reconfiguration
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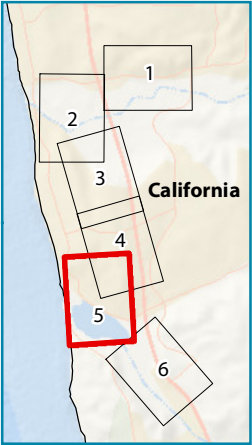
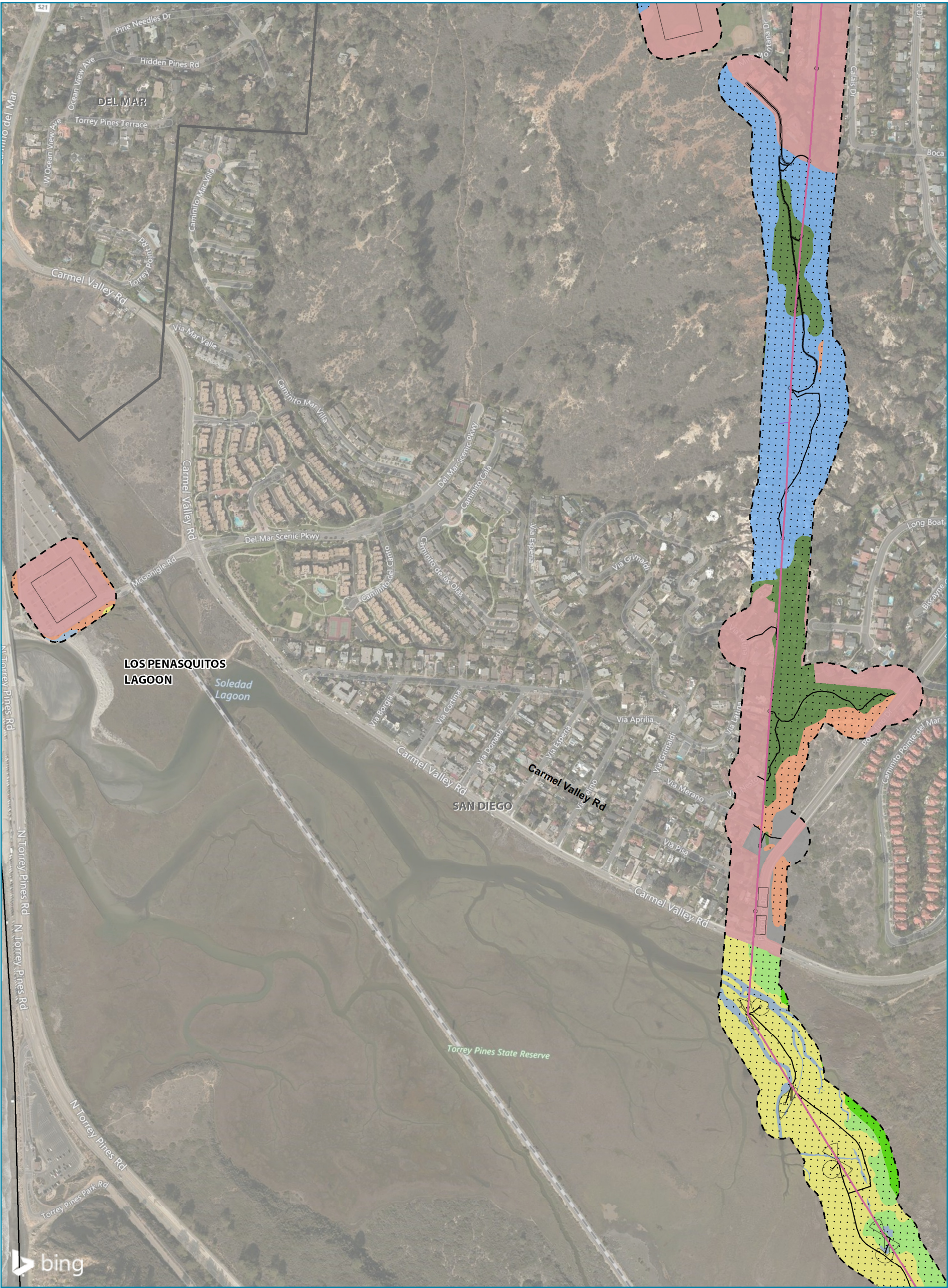
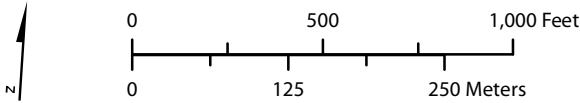


Figure 5.4-1
Natural Communities and ESHAs
in the BSA for the
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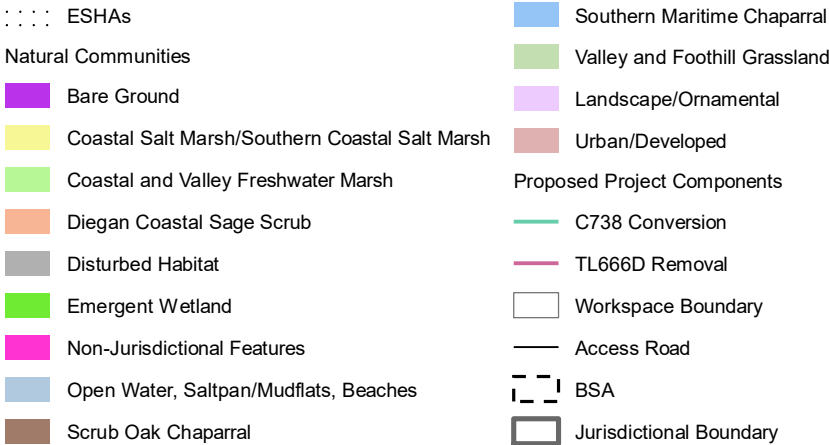
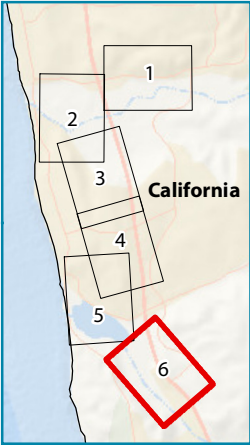
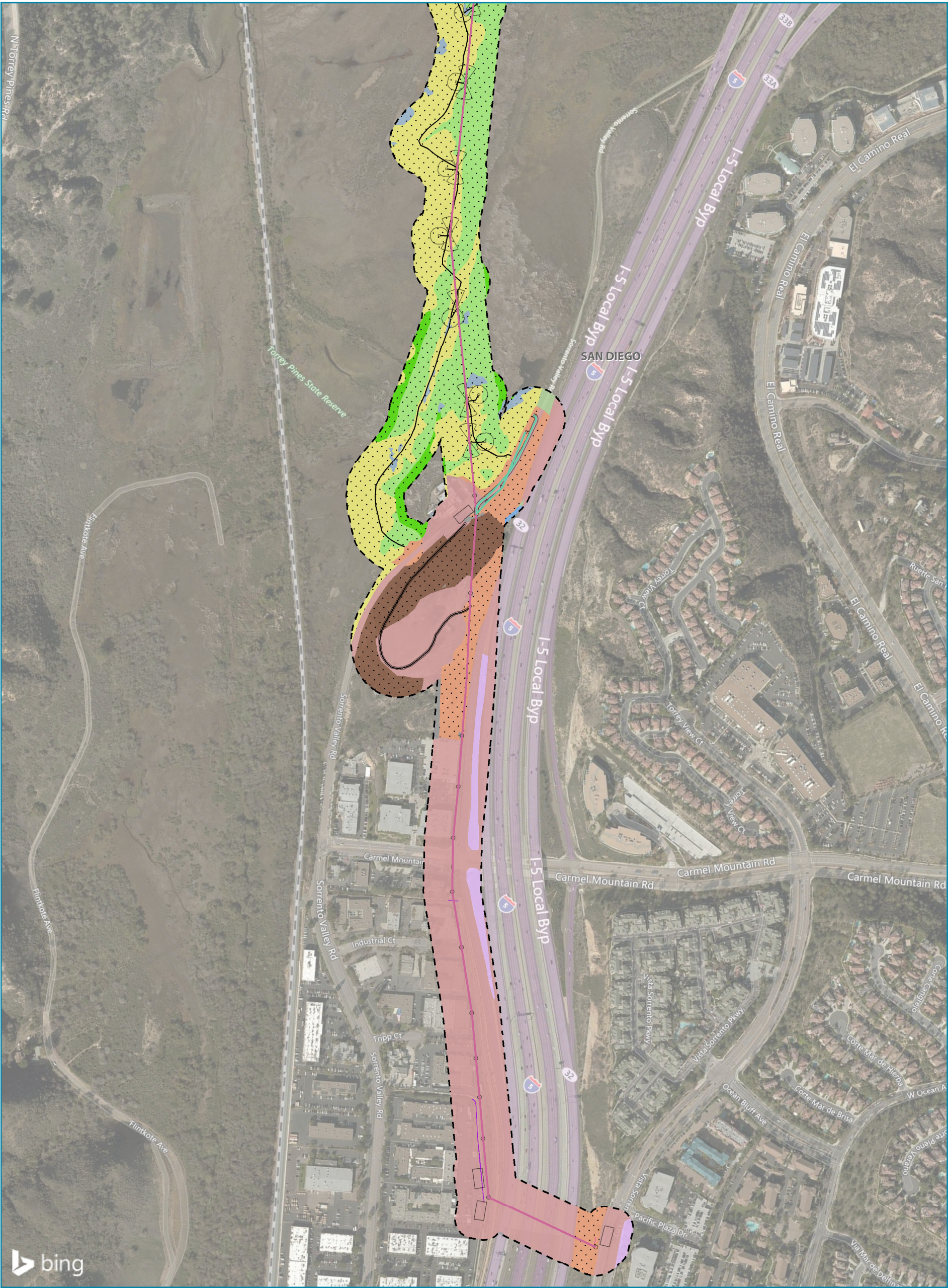
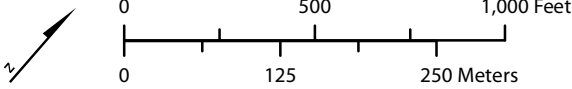


Figure 5.4-1
Natural Communities and ESHAs
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5.4.3.2 Special Status Species

Certain species of plants and wildlife have been accorded various levels of legal protection owing to elevated concern for their conservation status. Analyses in this IS/MND also consider effects on species, which, in the judgment of qualified professionals, meet the California Environmental Quality Act (CEQA) definitions of endangered, rare or threatened. Concern may arise because of dwindling populations or because additional study is needed to determine the population size. In this document, “special status species” include the following:

- Species listed under the Federal Endangered Species Act of 1973 (ESA) as “Endangered” (FE) or “Threatened” (FT) (Title 50, Code of Federal Regulations [CFR] Section 17.11 or 17.12);
- Species listed under the California Endangered Species Act (CESA) as “Endangered” (SE), “Threatened” (ST), or “Rare” (R) (Sections 670.2 or 670.5, Title 14, California Code of Regulations);
- Species without a formal listing status that meet the definitions of “Endangered” or “Rare” under CEQA Guidelines Section 15380, including CDFW “Species of Special Concern” (SSC); “Candidate” (FC), or species “Proposed” for listing under the ESA; USFWS “Birds of Conservation Concern;” and California Native Plant Society rare plant ranks, which are categorized into the following subsections:
 - 1A: Presumed extinct in California
 - 1B: Rare, threatened, or endangered in California and elsewhere
 - 2B: Rare, threatened, or endangered in California, but more common elsewhere
 - 3: Plants about which we need more information—A review list
 - 4: Plants of limited distribution—A watch list

These are further subcategorized by threat ranks:

 - 0.1: Seriously threatened in California
 - 0.2: Moderately threatened in California
 - 0.3: Not very threatened in California
- Species designated as “Fully Protected,” (FP) and “Watch List” (WL) by CDFW.
- Sensitive plant species on List A and sensitive animal species on Group 1 (and select animal species on Group 2) of the San Diego Multiple Species Conservation Program (MSCP) Covered Species List.
- Species listed on SDG&E’s Subregional Natural Community Conservation Plan (NCCP).

The potential for a special status species to occur within or near the project area was evaluated based on defined occurrence thresholds, described below:

Present: The species or its signs (tracks, scat, burrows, etc.) were observed within the BSA during surveys.

High: The BSA is within the known geographic range of the species, suitable habitat is present, and the species has recently (within the last 20 years) been observed within 1 mile of proposed project components.

Moderate: The BSA is located within the known geographic range of the species and the species has been observed within 1 mile of proposed project components within the last 20 years, but the species' habitat may be small or fragmented; *or* suitable habitat for the species is present within the BSA and the species has not been observed within 1 mile in the last 20 years, but the project area is at the fringe of the species' known geographic range.

Low: There is suitable habitat for this species within the BSA, but the habitat is extremely degraded or disturbed, and there have been no documented occurrences of this species within 1 mile of the proposed project in the last 20 years, and the project area is outside of the species' known geographic range.

None: There is no suitable habitat for this species within the BSA, and there are no known observations of this species within the last 20 years within 1 mile of proposed project components.

Special Status Plant Species

Based on the literature and database review described in Section 5.4.1, "Approach to Data Collection," 51 special status plants have the potential to occur within 1 mile of the project area. Of these 51 species, ~~47~~ 16 are present within the BSA, ~~40~~ nine have a high potential to occur within the BSA and/or within 1 mile of the project area, and 24 have a low or moderate potential to occur within 1 mile of the project area or are not expected to occur. Three of the special status plant species that are present or have a high potential to occur are listed as threatened or endangered by the ESA or CESA. Special status plant species that are fully restricted to habitats and natural communities that may occur within 1 mile of the proposed project, but that do not occur within the proposed project area (such as sandy beaches and the intertidal zone), were not identified as having a potential to occur. Special status plant species present in the BSA or having high potential to occur within 1 mile of the project area are listed in Table 5.4-3. Additional information, including habitat requirements of all special status plant species that could potentially occur within or near the project area, can be found in the Appendix C.

Table 5.4-3 Special Status Plants with the Potential to Occur within One Mile of the Project Area

Species	Conservation Status ^(a)	Potential to Occur
Beach goldenaster (<i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i>)	--/--, 1B.1, S1	Present
California adolphia (<i>Adolphia californica</i>)	--/--, 2B.1, S2	High
Cliff spurge (<i>Euphorbia misera</i>)	--/--, 2B.2, S2	Present
Coast barrel cactus (<i>Ferocactus viridescens</i> var. <i>viridescens</i>)	--/--, 2B.1, S2	Present
Coast wooly-heads (<i>Nemacaulis denudata</i> var. <i>denudata</i>)	--/--, 1B.2, S2, MSCP	Present
Decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	--/--, 1B.2, S2	High
Del Mar manzanita (<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>)	FE/--, 1B.1, S2, MSCP, NCCP	Present
Del Mar Mesa sand aster (<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i>)	--/--, 1B.1, S1, MSCP, NCCP	Present
Estuary seablite (<i>Suaeda esteroa</i>)	--/--, 1B.2, S2	Present
Golden-spined cereus (<i>Bergerocactus emoryi</i>)	--/--, 2B.2, G2, S2	Present
Long-spined spineflower (<i>Chorizanthe polygonoides</i> var. <i>longispina</i>)	--/--, 1B.2	High

Table 5.4-3 Special Status Plants with the Potential to Occur within One Mile of the Project Area

Species	Conservation Status ^(a)	Potential to Occur
Nuttall's acmispon (previously Nuttall's lotus) (<i>Acmispon prostratus</i> , formerly <i>Lotus nuttallianus</i>)	--/--, 1B.1, G1, S1, MSCP, NCCP	High
Nuttall's scrub oak (<i>Quercus dumosa</i>)	--/--, 1B.1	Present
Orcutt's pincushion (<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>)	--/--, 1B.1, S1	Present
Orcutt's spineflower (<i>Chorizanthe orcuttiana</i>)	FE/CE, 1B.1, G1, S1, NCCP	High
Palmer's frankenia (<i>Frankenia palmeri</i>)	--/--, 2B.1, S1	High
San Diego goldenstar (<i>Bloomeria clevelandii</i>)	--/--, 1B.1, G2, S2, MSCP, NCCP	High
San Diego marsh-elder (<i>Iva hayesiana</i>)	--/--, 2B.2, S2, MSCP	Present
Sand loving wallflower (coast wallflower) (<i>Erysimum ammodendrum</i>)	--/--, 1B.2, G2, S2, MSCP	Present
Sea dahlia (<i>Leptosyne maritima</i>)	--/--, 2B.2, G2, S1	Present
Shaw's agave (<i>Agave shawii</i> var. <i>shawii</i>) ^(b)	--/--, 2B.1, G2, S1, MSCP	High
Short-leaved dudleya (<i>Dudleya brevifolia</i>)	--/CE, 1B.1, G1, S1, MSCP, NCCP	High
South coast saltscale (<i>Atriplex pacifica</i>)	--/--, 1B.2, S2	Present
Southern tarplant (<i>Centromadia parryi</i> ssp. <i>australis</i>)	--/--, 1B.1, S2	High
Summer holly (<i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i>)	--/--, 1B.2, S2	Present
Torrey pine (<i>Pinus torreyana</i> ssp. <i>torreyana</i>)	--/--, 1B.2, G1, S1, MSCP	Present
Wart-stemmed ceanothus (<i>Ceanothus verrucosus</i>)	--/--, 2B.2, S2, MSCP	Present

Sources: AECOM 2017; UC Berkeley 2018; CalFlora 2018; CNPS 2018; iNaturalist 2018; USFWS 2017a

Notes:

^(a) Special status plant designations used in Table 5.4-3 are defined as follows:

FE: Federally Endangered

FT: Federally Threatened

CE: California Endangered

CT: California Threatened

MSCP: Sensitive plants on List A of the County of San Diego Multiple Species Conservation Plan Covered Species List

NCCP: SDG&E Subregional Natural Community Conservation Plan

California Native Plant Society Rare Plant Ranks

- 1A: Presumed extinct in California
- 1B: Rare, threatened, or endangered in California and elsewhere
- 2B: Rare, threatened, or endangered in California, but more common elsewhere
- 3: Plants about which we need more information—A review list
- 4: Plants of limited distribution—A watch list

California Native Plant Society Rare Plant Ranks further subcategorized by threat ranks:

- 0.1: Seriously threatened in California
- 0.2: Moderately threatened in California
- 0.3: Not very threatened in California

^(b) Shaw's agave is considered a Narrow Endemic Species in accordance with the City of San Diego Municipal Code Land Development Manual Biology Guidelines (City of San Diego 2012).

Special Status Wildlife Species

Based on the literature and database review, 92 special status wildlife species have the potential to occur within 1 mile of the project area. Of these species, 24 are present within the BSA, 23 species have a high potential to occur within the BSA or within 1 mile of the proposed project, and 46 species have no, low, or moderate potential to occur within 1 mile of the proposed project area. Seven species that are present or have a high potential to occur are listed as endangered under the ESA or CESA, and one is a candidate for listing under CESA. Special status wildlife species that are fully restricted to habitats that may occur within 1 mile of the proposed project, but that do not occur within the proposed project area (such as

sandy beaches, open ocean, and the intertidal zone), were not identified as having a potential to occur. Special status wildlife species that meet the criteria of “present” or “high potential” are listed in Table 5.4-4. Additional information, including habitat requirements of all special status wildlife species that could potentially occur within or near the project area, can be found in Appendix C.

Table 5.4-4 Special Status Wildlife with the Potential to Occur within One Mile of the Project Area

Species ^(a)	Conservation Status	Potential to Occur
Invertebrates		
Wandering (saltmarsh) skipper (<i>Panoquina errans</i>)	--/--, MSCP	Present
Western monarch butterfly (<i>Danaus plexippus</i>) – California overwintering population	--/--, County of San Diego MSCP Group II	Present
Reptiles		
Belding's orange-throated whiptail (<i>Aspidoscelis hyperythra beldingi</i>)	--/--, WL, MSCP, NCCP	Present
Coast horned lizard (<i>Phrynosoma blainvillei</i>)	--/--, SSC, MSCP, NCCP	High
Coronado skink (<i>Plestiodon skitonianus interparietalis</i>)	--/--, WL, NCCP	High
San Diegan tiger whiptail (Coastal whiptail) (<i>Aspidoscelis tigris stejnegeri</i>)	--/--, SSC	Present
San Diego ringed-neck snake (<i>Diadophis punctatus similis</i>)	--, NCCP	High
Birds		
Allen's Hummingbird (<i>Selasphorus sasin</i>)	--/--, BCC	Present
American peregrine falcon (<i>Falco peregrinus anatum</i>)	--/--, FP, BCC, MSCP, NCCP	Present
American White Pelican (<i>Pelecanus erythrorhynchos</i>)	--/--, SSC	Present
Belding's Savannah Sparrow (<i>Passerculus sandwichensis Beldingi</i>)	--/CE, MSCP, NCCP	Present
Black Skimmer (<i>Rynchops niger</i>)	--/--, SSC, BCC	High
Burrowing Owl (wintering) (<i>Athene cunicularia</i>)	--/--, SSC, BCC, MSCP, NCCP	High
California Brown Pelican (<i>Pelecanus occidentalis californicus</i>)	--/--, FP, MSCP, NCCP	Present
California Least Tern (<i>Sterna antillarum browni</i>)	FE/CE, FP, MSCP, NCCP	Present
Clark's Marsh Wren (<i>Cistophorus palustris clarkae</i>)	--/--, SSC	Present
Coastal California Gnatcatcher (<i>Poliopitila Californica Californica</i>)	FT/--, SSC, WL	Present
Cooper's Hawk (<i>Accipiter cooperi</i>)	--/--, WL, MSCP, NCCP	Present
Costa's Hummingbird (<i>Calypte costae</i>)	--/--, BCC	Present
Elegant Tern (<i>Thalasseus elegans</i>)	--/--, WL, NCCP	High
Grasshopper Sparrow (<i>Ammodramus Savannarum Perpallidus</i>)	--/--, SSC, NCCP	High
Gull-Billed Tern (<i>Gelochelidon nilotica</i>)	--/--, SSC, BCC	High
Large-Billed Savannah Sparrow (<i>Passerculus sandwichensis rostratus</i>)	--/--, SSC, MSCP, NCCP	High
Lawrence's Goldfinch (<i>Spinus lawrencei</i>)	--/--, BCC	High
Least Bell's Vireo (<i>Vireo bellii pusillus</i>)	FE/CE, MSCP, NCCP	High
Least Bittern (<i>Ixobrychus exilis</i>)	--/--, SSC, BCC	Present
Light-Footed Ridgway's Rail (<i>Rallus obsoletus levipes</i>)	FE/CE, FP, MSCP, NCCP	Present
Loggerhead Shrike (<i>Lanius ludovicianus</i>)	--/--, SSC, BCC	High
Long-Billed Curlew (<i>Numenius americanus</i>)	--/--, WL, BCC, MSCP, NCCP	Present
Marbled Godwit (<i>Limosa fedoa</i>)	--/--, BCC	High
Northern Harrier (<i>Circus cyaneus</i>)	--/--, SSC, MSCP, NCCP	Present
Reddish Egret (<i>Egretta rufescens</i>)	--/--, MSCP, NCCP	Present
Saltmarsh Common Yellowthroat (<i>Geothlypis trichas sinuosa</i>)	--/--, SSC, BCC	High
Short-Billed Dowitcher (<i>Limnodromus girseus</i>)	--/--, BCC	High
Southern California Rufous-Crowned Sparrow (<i>Aimophila ruficeps canescens</i>)	--/--, WL, MSCP, NCCP	High

Table 5.4-4 Special Status Wildlife with the Potential to Occur within One Mile of the Project Area

Species ^(a)	Conservation Status	Potential to Occur
Tricolored Blackbird (<i>Agelaius Tricolor</i>)	--/Candidate Endangered, SSC, BCC, MSCP, NCCP	High
Vermilion Flycatcher (<i>Pyrocephalus rubinus</i>)	--/--, SSC	High
Western Bluebird (<i>Sialia Mexicana</i>)	--/--, MSCP, NCCP	High
Western Snowy Plover (<i>Charadrius nivosus nivosus</i>) – nesting populations	FT/--, SSC, BCC, MSCP, NCCP	High
Whimbrel (<i>Numenius phaeopus</i>)	--/--, BCC	Present
White-Faced Ibis (<i>Plegadis chihi</i>)	--/--, WL, MSCP, NCCP	Present
White-Tailed Kite (<i>Elanus Leucurus</i>)	--/--, FP	Present
Yellow-Breasted Chat (<i>Icteria Virens</i>)	--/--, SSC	High
Yellow Warbler (<i>Setophaga Petechia</i>)	--/--, SSC, BCC	Present
Mammals		
San Diego pocket mouse (<i>Chaetodipus fallax fallax</i>)	--/--, SSC, NCCP	High
Pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>)	--/--, SSC	High
Southern mule deer (<i>Odocoileus hemionus fuliginata</i>)	--/--, MSCP, NCCP	Present

Sources: AECOM 2017; Bruyeta Biological Consulting 2017; California Herps 2018; CDFW 2016, 2017, 2018a; County of San Diego 2010; eBird 2018; iNaturalist 2018; NOAA 2016; National Audubon Society n.d.(a); SDG&E 1995; USFWS 2008; USFWS 2017a; Xerces 2016a; Xerces and NatureServe 2015; Xerces and Monarch Joint Venture 2018

Notes:

(a) No special status amphibians were determined to be present within the BSA or with a high potential to occur within 1 mile of the project area.

(b) Western monarch butterfly is not a special status species under applicable jurisdictions, but is protected as a Group 2 MSCP species on the County of San Diego Sensitive Animal List (County of San Diego 2010), and overwintering populations of the western monarch butterfly are of recent concern due to declining populations and fragmented habitat (Xerces 2016a). Because western monarch butterfly was observed during surveys and is known to overwinter in multiple sites near the project area (Xerces and Monarch Joint Venture 2018), it has been included in this report as part of a conservative analysis.

Special status wildlife designations used in Table 5.4-4 are defined as follows:

FE: Federally Endangered

FT: Federally Threatened

CE: California Endangered

CT: California Threatened

FC: Candidate species proposed for listing under ESA

FP: CDFW Fully Protected

WL: CDFW "Watch List"

SSC: CDFW Species of Special Concern

BCC: USFWS Birds of Conservation Concern

NCCP: SDG&E Subregional Natural Community Conservation Plan

MSCP: Sensitive animals in Group 1 on the County of San Diego Multiple Species Conservation Plan Covered Species List

5.4.3.3 Environmentally Sensitive Habitat Areas

The California Coastal Act (CCA) designates Environmentally Sensitive Habitat Areas (ESHAs) as “any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments” (see Section 5.4.4, “Regulatory Setting”) (State of California 2018). Within the BSA, SDG&E has identified coastal sage scrub, maritime chaparral, wetland communities, and all areas containing suitable habitat for special status species within the coastal zone, as potential ESHAs (SDG&E 2017). Based on a subsequent desktop analysis of the updated 448.3-acre BSA, additional natural communities have been determined to be considered for ESHA recommendation. While all natural communities that are recommended for consideration as ESHAs within the proposed project alignment are described in Table 5.4-5, final ESHA determination is under California Coastal Commission (CCC) jurisdiction. For the purpose of maintaining a conservative environmental analysis of the proposed project

all natural communities indicated in Table 5.4-5 are considered to be ESHAs, and the CCC may make additional environmental determinations regarding these or other sites determined to be ESHAs.

Table 5.4-5 Natural Communities within the Project Area Recommended for ESHA Consideration

Natural Community	ESHA within the BSA (acres)	ESHA within Workspaces (acres)
Diegan Coastal Sage Scrub	30.4	0.2
(Southern) Mixed Chaparral	14.8	0.1
(Southern) Maritime Chaparral	17.3	0.2
Torrey Pine Forest	8.7	0.2
Scrub Oak Chaparral	5.2	0.2
Wetland Communities		
Open Water/Beach/Salt Pan/Mudflat	26.7	0.7
Coastal Salt Marsh (including Southern Coastal Salt Marsh)	40.7	4.1
Emergent Wetland	2.3	none
Southern Arroyo Willow Riparian Forest	0.9	<0.1
Coastal and Valley Freshwater Marsh	13.2	0.8
Total	160.2	6.5

Sources: AECOM 2017; CDFG 2010; CDFW 2010; CCC 2018

Key:

BSA = Biological Survey Area

ESHA = Environmentally Sensitive Habitat Areas

5.4.3.4 Critical Habitat

USFWS designates critical habitat for plant and wildlife species that are federally listed as threatened or endangered under the ESA (USFWS 2017b). Critical habitat provides physical or biological features critical to the conservation of the species and may require special conservation management or protection.

Critical habitat in the project area was identified using the USFWS Environmental Conservation Online System (ECOS) Critical Habitat ArcGIS Mapper (USFWS 2017a). There is no critical habitat within proposed project work areas or within the BSA. Critical habitat within approximately 1 mile of the project area is described in Table 5.4-6.

Table 5.4-6 Critical Habitat Within Approximately One Mile of the Project Area

Species	Critical Habitat	Distance from Nearest Project Component
Western Snowy Plover (<i>Charadrius alexandrinus nivosus</i>)	3.93	0.11 miles
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>) ^(a)	5.70	1.05 miles

Source: USFWS 2017a

Note:

^(a) Only USFWS-designated Critical Habitat within 1 mile of proposed project features was incorporated into this analysis, but the San Diego fairy shrimp critical habitat 1.05 miles from the proposed project was disclosed due to proximity to the one-mile threshold.

5.4.3.5 Aquatic Resources/Jurisdictional Waters

In 2013 Aquatic Resources surveys and in supplemental 2016–2017 surveys that were intended to update 2013 survey data to reflect current conditions, 61 total acres of potentially jurisdictional Waters of the United States and the State of California were identified within the 325-acre BSA (AECOM 2017). These waters are jurisdictional under the USACE, CDFW, Regional Water Quality Control Board (RWQCB), and/or CCC. Therefore, potentially impactful activities that would occur within these areas would be

under the jurisdiction of the applicable agency or agencies.

The proposed project is located within the Mediterranean California subregion of the Arid West Region, as identified by the USACE (USACE 2008). Within this region, the USACE describes wetlands as often being seasonally flooded and interspersed with non-wetland woody riparian habitats, and often occur near reservoirs, ephemeral, intermittent, and perennial streams and rivers, man-made depressions, agricultural areas, and man-made features. Wetlands and non-wetland waters are Waters of the United States, which under USACE permitting authority includes surface waters, interstate waters, lakes, and wetlands adjacent to other waters, including tidal waters (USACE n.d.).

Table 5.4-7 below identifies potentially jurisdictional aquatic natural communities within the BSA and within proposed project work areas.

Table 5.4-7 Acres of Potentially Jurisdictional(a) Aquatic Natural Communities within the BSA and Project Work Areas

Jurisdictional Feature Type	Natural Community	Regulatory Agencies	Acres within the BSA	Acres within Project Work Areas
Wetland	Coastal and Valley Freshwater Marsh	USACE, CDFW, RWQCB, CCC	13.2	0.8
Wetland	Southern Arroyo Willow Riparian Forest	USACE, CDFW, RWQCB, CCC	0.9	<0.1
Wetland	Southern Coastal Salt Marsh	USACE, CDFW, RWQCB, CCC	34.5	4.1
Wetland	Coastal Salt Marsh	USACE, CDFW, RWQCB, CCC	4.7	<0.1
Wetland	Emergent Freshwater Marsh	USACE, CDFW, RWQCB, CCC	2.3	None
Wetland/ Non-wetland Waters ^(b)	Open Water/Beach/Saltpan/Mudflat ^(c)	USACE, CDFW, RWQCB, CCC	26.7	0.7
Non-wetland Waters	Bare Ground	USACE, CDFW, RWQCB, CCC	0.1	<0.1
Total^(b)			82.3	5.6

Notes:

^(a) CCC-jurisdictional ESHA natural communities, including but not limited to aquatic communities, are discussed above in Section 5.4.3.3.

^(b) Open water, beach, and saltpan are considered Non-Wetland Waters of the United States, while mudflat is considered a Wetland Water of the United States.

^(c) Total acreage is an approximation due to rounding.

Key:

CCC = California Coastal Commission

CDFW = California Department of Fish and Wildlife

ESHA = Environmentally Sensitive Habitat Areas

RWQCB= Regional Water Quality Control Board

USACE= U.S. Army Corps of Engineers

Within the natural communities described above in Table 5.4-7, a total of 24 hydrologic features were identified within the BSA during the 2013 Aquatic Resources Survey, 28 of which were identified as likely being under USACE, CDFW, RWQCB, and/or CCC jurisdiction (RECON 2013). These 28 potentially jurisdictional hydrologic features are described below in Table 5.4-8. Features are listed by their identifying numbers as described in the 2013 Aquatic Resources Survey Report.

Table 5.4-8 Potentially Jurisdictional Hydrologic Features within the BSA and Project Work Areas

Feature ID	Feature Type	Likely Regulatory Designation(s)
Feature 3	Ephemeral drainage	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland
Feature 4	Ephemeral drainage	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland
Feature 5	Ephemeral drainage	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland
Feature 8*	Saltpan	USACE Wetland Water of the United States RWQCB Water of the State CCC Wetland
Feature 9*	Coastal Salt Marsh (pickleweed-dominated)	USACE Wetland Water of the United States CDFW Wetland RWQCB Water of the State CCC Wetland
Feature 10	Open Water	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland
Features 11–19*	San Dieguito Estuary (Lagoon)	<u>Open Water:</u> USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland <u>Salt Marsh:</u> USACE Wetland Water of the United States CDFW Wetland RWQCB Water of the State CCC Wetland <u>Mudflat:</u> USACE Special Aquatic Site RWQCB Water of the State CCC Wetland
Feature 21	Ephemeral drainage	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland

Table 5.4-8 Potentially Jurisdictional Hydrologic Features within the BSA and Project Work Areas

Feature ID	Feature Type	Likely Regulatory Designation(s)
Features 22–31*	Peñasquitos Estuary (Lagoon)	<u>Open Water:</u> USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland <u>Salt Marsh:</u> USACE Wetland Water of the United States CDFW Wetland RWQCB Water of the State CCC Wetland <u>Mudflat:</u> USACE Special Aquatic Site RWQCB Water of the State CCC Wetland <u>Emergent Freshwater Marsh:</u> USACE Wetland Water of the United States CDFW Wetland RWQCB Water of the State CCC Wetland <u>Saltpan:</u> USACE Wetland Water of the United States RWQCB Water of the State CCC Wetland
Feature 32	Drainage	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland
Feature 33	Drainage	USACE Non-Wetland Water of the United States CDFW Streambed RWQCB Water of the State CCC Wetland

Note:

An asterisk (*) indicates that the feature exists within or adjacent to proposed project workspaces.

Key:

CCC = California Coastal Commission

CDFW = California Department of Fish and Wildlife

RWQCB= Regional Water Quality Control Board

USACE= U.S. Army Corps of Engineers

5.4.3.6 Wildlife Movement

Wildlife corridors and habitat linkages allow for uninterrupted movement and migration of species, and prevent fragmentation and isolation of plant and wildlife populations (CDFW 2018b). Riparian corridors and drainages within or near the project area that connect upland and open space areas to expansive, intact habitat areas are described in Table 5.4-9.

San Dieguito Lagoon and Los Peñasquitos Lagoon are important habitat corridors in the project area. The lagoons are part of the North San Diego Lagoons, a unified group of coastal lagoons that are considered an Important Bird Area (National Audubon Society n.d.[b]), an area of critical conservation focus for bird species. The lagoons are also part of the Pacific Flyway, a major north-south migration corridor for birds stretching from Alaska to Patagonia.

Table 5.4-9 Wildlife Corridors and Linkages Crossed by or Adjacent to the Project Feature

Feature ID	Wildlife Corridor/Linkage	Nearest Project Feature	Distance from Feature
1	San Dieguito Lagoon (including State Marine Conservation Area)	TL666D	Crossed
2	San Dieguito River	New steel pole, TL674A	Adjacent
3	Crest Canyon Neighborhood/Open Space Park	TL666D	Crossed
4	Torrey Pines State Natural Reserve Extension	TL666D	Crossed
5	Torrey Pines State Reserve (Los Peñasquitos Lagoon), including Peñasquitos Creek ^(b)	TL666D	Crossed
6	Los Peñasquitos Canyon ^(c)	TL666D	0.75 miles southeast
7	Unnamed crossing beneath Interstate 5, south of Carmel Valley Road ^(c)	TL666D	0.3 miles east
8	Pacific Flyway	Entire project alignment	N/A

Notes:

(a) Corresponds to Figure 5.4-2.

(b) The proposed project runs adjacent to a segment of Peñasquitos Creek within Los Peñasquitos Lagoon.

(c) Los Peñasquitos Canyon and the unnamed crossing beneath Interstate 5 and south of Carmel Valley Road are not adjacent to or crossed by the proposed project, but they are both within 1 mile of the project area and are linked to Torrey Pines State Reserve, forming a connective wildlife corridor that is incorporated into this analysis. Both sites surrounded by additional suitable habitat, and Los Peñasquitos Canyon is accessible from Los Peñasquitos Creek. Los Peñasquitos Canyon is a Natural Landscape Block defined by the California Essential Habitat Connectivity Project (Spencer et al. 2010), and is therefore included in this report.

Western monarch butterflies, which migrate to coastal California in the fall, utilize eucalyptus and pine trees in the lagoons to overwinter. Western monarchs were incidentally observed within the BSA during wandering skipper (*Panoquina errans*) surveys. While these individuals are not part of a protected overwintering population, protected overwintering sites for this species occur within 1 mile of the project area (Table 5.4-10).

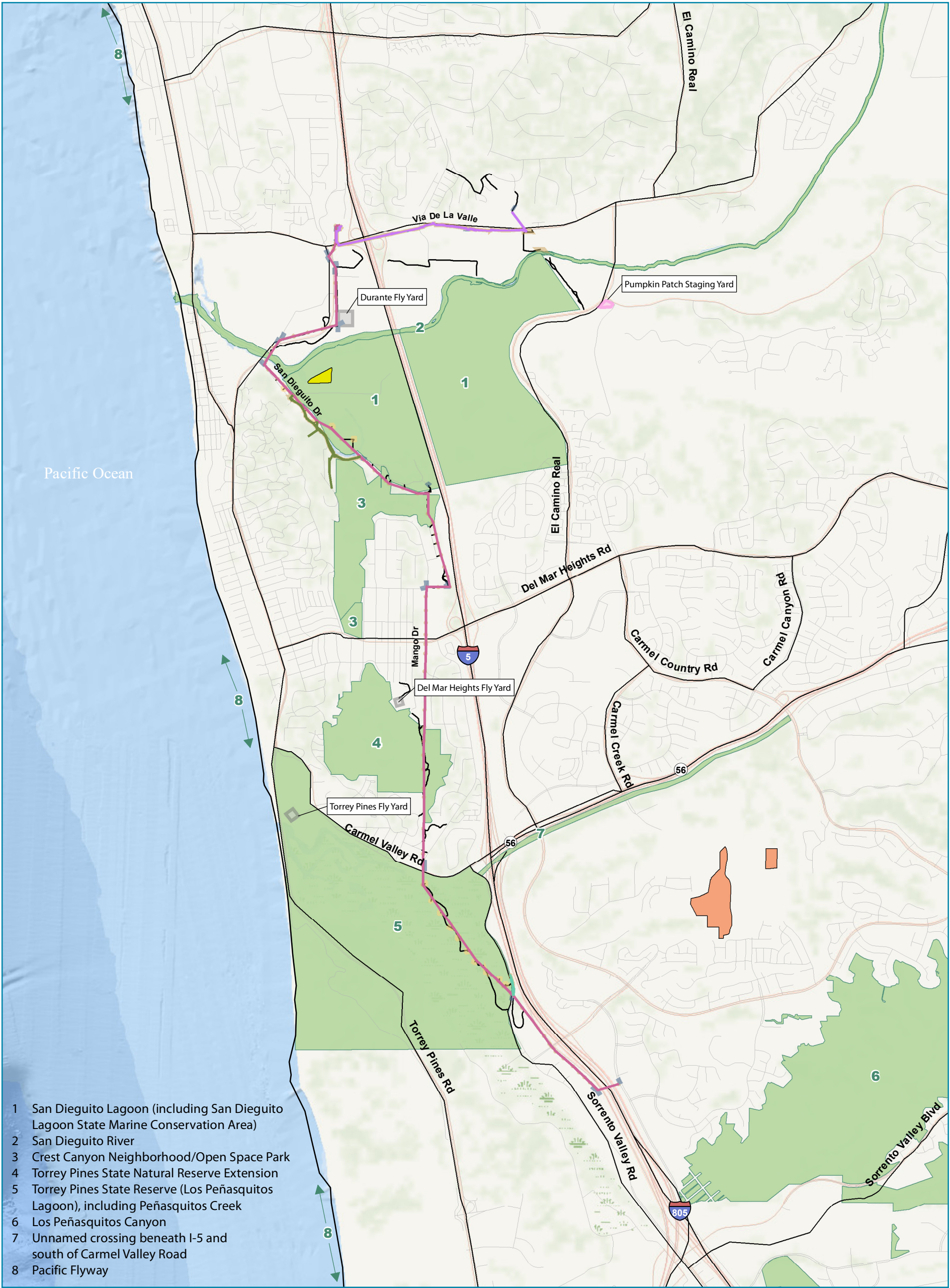
Table 5.4-10 Western Monarch Butterfly Overwintering Populations within Project Vicinity

Approximate Location	Nearest Proposed Project Feature	Approximate Distance
Intersection of 15th Street and Crest Road	C510	0.2 miles west
Where Nogales Drive meets Torrey Pines State Reserve Extension	Del Mar Heights Fly Yard	0.3 miles west
Where Hidden Pines Lane meets Torrey Pines State Reserve Extension	Del Mar Heights Fly Yard	0.4 miles west
Torrey Pines State Natural Reserve	TL666D	0.6 miles west
Torrey Pines State Natural Reserve	TL666D	0.9 miles southwest

Source: Xerces and Monarch Joint Venture 2018

5.4.4 Regulatory Setting

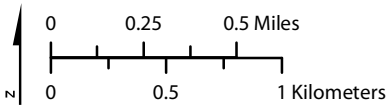
This section summarizes federal, state, and local laws, regulations, and standards that govern biological resources in the proposed project area.



- | | | |
|------------------------|-----------------------------|----------------|
| Wildlife Corridor | Proposed Project Components | Drop Zone |
| USFWS Critical Habitat | C510 Conversion | Fly Yard |
| San Diego fairy shrimp | C738 Conversion | Staging Yard |
| Western snowy plover | TL666D Removal | Stringing Site |
| | TL674A Reconfiguration | Work Area |
| | Access Roads | |

Figure 5.4-2
Wildlife Corridors and Critical Habitat
Within One Mile of the
TL 674A Reconfiguration and
TL666D Removal Project
San Diego County, California

June 2018



Sources: CPAD 2017, San Diego Gas and Electric (SDG&E) 2018; Earth Systems Research Institute (ESRI) 2018, USFWS 2018

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5.4.4.1 Federal

Federal Endangered Species Act

Enacted to protect threatened and endangered (T&E) species and the ecosystems upon which they depend, the ESA (16 United States Code [U.S.C.] 1531 et seq.) is administered by USFWS and the National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the NMFS is mainly responsible for marine wildlife. The ESA makes it unlawful for any person to take a listed T&E species without a permit. Take is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct.” Section 7 of the ESA requires a federal agency to consult with the USFWS when any action it carries out, funds, or authorizes may affect a listed T&E species. For projects that are not carried out, funded, or authorized by a federal agency, Section 10 of the ESA allows the USFWS to issue a permit to the project proponent to take listed T&E species incidental to otherwise legal activity.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703–712) makes it illegal to “pursue, hunt, take, capture, kill, attempt to take, capture, kill, possess, sell, and barter” native migratory bird species without a permit.” The MBTA is a multi-national effort to protect migratory birds, including eggs, young, nests, and feathers, and does not discriminate between live or dead birds. This act extends to almost all migratory birds and includes 1,026 species, including almost 60 species that may be legally hunted. The MBTA allows the USFWS to issue permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (e.g., rehabilitation, education, migratory game bird propagation, and salvage), and take of predatory birds, taxidermy, and waterfowl sale and disposal. The MBTA excludes upland game birds and non-native species (e.g., quail, turkeys, European starlings).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (16 U.S.C. 668–668d) makes it illegal to take bald eagles or golden eagles or to trade in eagle parts, eggs, or feathers. Take has been broadly interpreted to include altering or disturbing nesting habitat. The regulations include a USFWS program that will allow issuance of two new types of permits to authorize take: one addressing take in the form of disturbance or actual physical take of eagles (50 CFR 22.26), and the other providing for removal of nests (50 CFR 22.27). Most permits issued under the new regulations are expected to be those that would authorize disturbance, as opposed to physical take (i.e., take resulting in mortality). The USFWS will issue permits for physical take in very limited cases only, where every precaution has been implemented to avoid physical take and where other restrictions and requirements will apply.

Fish and Wildlife Conservation Act

The 1988 amendment to the Fish and Wildlife Conservation Act of 1980 requires the USFWS to “identify species, subspecies, and populations of all migratory non-game birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act of 1973” (16 U.S.C. § 2912[a][3]). The Birds of Conservation Concern (BCC) list is the result of this mandate. BCC species are given the highest conservation priority to prevent or remove the need for additional bird listings under the ESA by implementing proactive management and conservation actions. The BCC list that is currently

in effect is the Bird of Conservation Concern 2008 list (USFWS 2008). The Bird Conservation Region 32 list (Coastal California) is jurisdictional within the project area.

Clean Water Act

The Clean Water Act (CWA) (33 U.S.C. 1251 et seq.) regulates the discharge of pollutants into waters of the U.S. with the objective to restore and maintain the chemical, physical, and biological integrity of the nation's waters.

Section 404

Under Section 404 of the CWA, the USACE is authorized to regulate the discharge of fill or dredged material into waters of the U.S., which includes wetlands and non-wetland waterbodies, and waters that are subject to the ebb and flow of the tide shoreward to the mean high water mark. Wetlands are defined as land "inundated or saturated by surface or ground water at a frequency or duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3; 40 CFR 230.3). The USACE has the authority to determine if a wetland or waterbody is subject to regulatory jurisdiction under Section 404. A Section 404 nationwide or individual permit from the USACE is required if the project would dredge or fill waters of the U.S. A nationwide permit authorizes activities that have minimal adverse environmental effects and are issued for a permit of no more than five years. There are currently 54 nationwide permit categories that authorize a wide variety of activities across the country, such as residential developments, utility lines, road crossings, and wetland and stream restoration activities. An individual or standard permit is issued for activities that have potentially significant environmental impacts. The review process for an individual permit requires public review and a public comment period. To be determined upon consultation with USACE, issuance of Nationwide Permit 12, and potentially other Nationwide Permits, may be required prior to commencing proposed project construction within or adjacent to jurisdictional features. Nationwide Permit 12 is required for utility line activities, including the removal of existing utility lines, within or adjacent to Waters of the United States, if activities do not result in the loss of more than one-half acre of Waters of the United States. Project activities that may require Nationwide Permit 12 compliance would include utility line removal activities within Waters of the United States, and the trenching and underground installation of utility lines adjacent to Waters of the United States (USACE 2017).

Section 401

Under federal CWA Section 401, every applicant for a federal permit or license for any activity which may result in a discharge to a water body must obtain State Water Quality Certification that the proposed activity will comply with state water quality standards. In California, the RWQCB administers the Section 401 Water Quality Certification Program. Section 401 Certification is required before the USACE may issue an individual or nationwide Section 404 permit.

5.4.4.2 State

California Endangered Species Act

The CESA (California Fish and Game Code [CFGF] Section 2050 et seq.) is similar to the federal ESA and is administered by the CDFW. The CESA prohibits the take of CESA-listed species unless specifically provided for under another state law. “Take” means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. CDFW allows take through Section 2081 agreements. Alternatively, where a proposed project is likely to impact species that are listed under both federal and state protection, the provisions of Section 2080.1 allow the CDFW to review the federal document (i.e., the Biological Assessment) for consistency with the CESA and state requirements. Sections 670.2 and 670.5 list wildlife and plant species that are threatened or endangered in California or by the federal government under the ESA.

The CDFW also identifies species of concern as those that may become listed as threatened or endangered due to loss of habitat, limited distributions, and diminishing population sizes or because the species is deemed to have scientific, recreational, or educational value. Species considered future protected species by the CDFW are designated California SSC. SSC currently have no legal status, but are considered indicator species useful for monitoring regional habitat changes.

California Fish and Game Code

- *Protection for Wetland and Riparian Habitats (Sections 1600 et seq.).* Pursuant to CFGF Section 1600 et seq., CDFW has authority over all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state. A Lake or Streambed Alteration Agreement may be required for any proposed project that would result in an adverse impact to a river, stream, or lake. CDFW jurisdiction typically extends to the top of the bank and out to the outer edge of adjacent riparian vegetation, if present.
- *Protection of Birds and Raptors (Sections 3503, 3503.5).* According to CFGF Section 1802, the CDFW has jurisdiction over the conservation, protection, and management of all California wildlife, fish, native plants (including state-listed T&E and other special status species), and their habitats necessary to maintain biologically sustainable populations. CFGF Section 3503 specifies the following general provision for birds: “it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” Section 3503.5 states that it is “unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season that results in the incidental loss of fertile eggs or nestlings or otherwise leads to nest abandonment is considered take.
- *Protection of Fully Protected Species (Sections 3511 and 5050).* The CDFW considers disturbance that causes nest abandonment or loss of reproductive effort to be take. Sections 3511 and 5050 prohibit the taking and possession without a permit of birds and reptiles listed as “fully protected,” (FP).
- *Native Plant Protection Act (Section 1900).* CFGF Section 1900 establishes the California Native Plant Protection Act, which includes provisions that prohibit the taking of listed rare or

1 endangered plants from the wild. The act also includes a salvage requirement for landowners.
2 Furthermore, it gives the CDFW authority to designate native plants as endangered or rare and
3 establishes protection measures. Under Section 1913(B) of the California Fish and Game Code,
4 actions undertaken by an agency or publicly or privately owned public utility to fulfill its
5 obligation to provide service to the public are exempted from take prohibitions under the Native
6 Plant Protection Act.

7 8 **Porter–Cologne Water Quality Control Act (Porter-Cologne Act)**

9 The Porter–Cologne Act (California Water Code, Division 7) regulates surface water and groundwater
10 quality in the state and also assigns to the SWRCB responsibility for implementing CWA Sections 401
11 (Water Quality Certification), 402 (National Pollutant Discharge Elimination System), 303(d) (List of
12 Impaired Water Bodies), and 305(b) (Report on the Quality of Waters in California), and the SWRCB has
13 delegated the authority to the nine RWQCBs. The SWRCB and RWQCBs are responsible for issuing
14 permits for certain point source discharges and for regulating construction and stormwater runoff.

15
16 The RWQCBs regulate discharges to waters within their respective jurisdictions through administration
17 of National Pollutant Discharge Elimination System permits, waste discharge requirements, and CWA
18 Section 401 Water Quality Certifications. RWQCBs administer Section 401 water quality certifications to
19 ensure that projects with federal 404 permits do not violate state water quality standards. The SWRCB
20 has jurisdiction over depositing fill or dredging in “State Only Waters” and issues Waste Discharge
21 Requirements for these projects. Construction projects may require RWQCB approval of a 401 Water
22 Quality Certification, and Waste Discharge Requirements and/or a Low Threat Discharge Permit covering
23 construction activities related to discharges from hydrostatic pipeline testing and construction dewatering.

24
25 The SWRCB and RWQCBs are responsible for developing and implementing regional basin plans to
26 regulate all pollutants or nuisance discharges that may affect either surface water or groundwater. Basin
27 plans are prepared by the RWQCBs to establish water quality standards for both surface and groundwater
28 bodies within their respective jurisdictions. Basin plans designate beneficial uses for surface and
29 groundwater, set narrative and numerical objectives that must be attained or maintained to protect the
30 designated beneficial uses, and describe implementation programs to protect all waters in the region.
31 Under Section 303(d) of the CWA, the RWQCB develops a list of impaired water bodies in which water
32 quality is impeding the attainment of beneficial uses.

33 34 **California Coastal Act of 1976**

35 Under the CCA, the CCC, in partnership with coastal cities and counties, plans and regulates
36 development within the coastal zone. Development is broadly defined under the CCA to include
37 construction activities and the use of land and water within the coastal zone (State of California 2018).

38
39 Title 14, Section 13253 of the California Code of Regulations states that a Coastal Development Permit
40 (CDP) is required for projects located within the coastal zones that have the potential to damage the
41 coastal environment, including utility projects. The proposed project is entirely within the coastal zone
42 and would need to comply with regulations per the CCA. Under the CCA, authority to issue CDPs is
43 delegated to the local permitting agencies for which the CCC has certified a Local Coastal Program
44 (LCP). Local governments, in partnership with the CCC, use the LCP implementing policies as a guide to

future development activities within the coastal zone. The City of San Diego and City of Del Mar have certified LCPs that would apply to the project area, as further described below.

The CCA also defines CCC-jurisdictional ESHAs as areas that are suitable to plants, wildlife, or habitats that are “rare” according to CDFW or another governing authority, or that support important ecosystem functions such as wildlife linkages or corridors (Caltrans 2017). The proposed project area is known to support ESHAs, and the following CCA policies would pertain to those areas when applicable:

CCA Section 30121 Wetlands

“Wetland” means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens.

CCA Section 30240 Environmentally Sensitive Habitat Areas; Adjacent Developments

- a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
- b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

5.4.4.3 Regional and Local

SDG&E’s public utility projects, such as the proposed project, are not subject to the regulatory jurisdiction of local governments, and are therefore not governed by the conditions of local or regional conservation planning efforts. However, CEQA requires an analysis of a project’s compatibility with local and regional habitat conservation plans (see Impacts BR-5 and BR-6). SDG&E may coordinate with regional and local jurisdictions to achieve consistency with their conservation planning efforts to the extent feasible. Therefore, this section gives an overview of local ordinances in San Diego County.

In 1992, the State of California enacted the NCCP Act. This voluntary program allows the state government to enter into planning agreements with landowners, local governments, and other stakeholders to prepare plans to identify lands that should be prioritized to conserve threatened or endangered species, and lands that may be better suited to development. In California, the CDFW and USFWS have worked to combine the NCCP program with the federal Habitat Conservation Program (HCP) process. These plans establish conditions under which a local government, such as the County, will receive from USFWS and CDFW certain long-term take authorizations (i.e., incidental take permits) which allow the taking of Covered Species incidental to land development and other lawful land uses authorized by the County. This delegation of authority is allowed pursuant to Section 10(a)(1)(B) of the ESA, the NCCP Act, and CESA. Several large-scale conservation plans and programs have been approved or are in development in San Diego and Del Mar. Below are descriptions of the plans whose boundaries the proposed project crosses.

Habitat Conservation Plans

County of San Diego MSCP: City of San Diego Subarea Plan

The San Diego MSCP, governed by the County of San Diego, serves as a Multiple Species Habitat Conservation Program pursuant to Section 10(a)(1)(b) of the ESA and a Natural Community Conservation Plan under the California Natural Communities Conservation Planning Act. The San Diego MSCP preserves boundaries that encompass an area known as the Multiple Planning Habitat Area (MHPA). The MSCP was developed to protect biodiversity in the region through the preservation of a network of habitats and open space areas, outlines specific criteria and requirements for projects within the MHPA, and authorizes take for 85 Covered Species.

Local jurisdictions implement their respective portions of the San Diego MSCP Plan through subarea plans, which describe specific implementing mechanisms for the San Diego MSCP. The San Diego MSCP Subarea Plan, also referred to as the South County MSCP, applies to unincorporated lands within southern San Diego County. The City of San Diego also adopted a subarea plan. Additionally, much of the proposed project is within the northern area of the City of San Diego MHPA in Los Peñasquitos Lagoon and Torrey Pines State Natural Reserve Extension. The regional MSCP subarea plans collectively serve as a multiple species HCP pursuant to Section 10(a)(1)(b) of the federal ESA.

The San Diego MSCP allows for the development of infrastructure and utility projects and road modifications within MHPA boundaries if the project is consistent with adopted community or subregional plans, and incorporates appropriate mitigation strategies and/or alternatives to minimize impacts to sensitive biological resources. Projects within the MHPA must demonstrate compliance with the Land Use Considerations described in the MSCP that are intended to preserve biological resources. Utility lines are considered conditionally compatible with the MHPA when developed in accordance with the described measures.

SDG&E Subregional NCCP

The proposed project is located within the boundaries of SDG&E's Subregional NCCP. The SDG&E Subregional NCCP, adopted in 1995, was developed to establish and implement a long-term agreement among CDFW, USFWS, and SDG&E. The NCCP authorized take of 110 Covered Species as a result of the development, installation, operation, and maintenance of SDG&E facilities, while also providing for the conservation and preservation of these species. The NCCP allows for up to 400 acres of impacts in natural areas before requiring an amendment. (SDG&E 1995)

SDG&E Native Endangered and Threatened Species HCP

In order to obtain a USFWS incidental take permit, applicants must develop a HCP, which is a planning document that describes potential effects of proposed take, impact minimization or mitigation measures, and HCP funding procedures and protocols (USFWS 2011). On March 2, 2017, SDG&E received a Native Endangered and Threatened Species HCP, which permitted additional take of up to 15 individual covered species between March 2017 and March 2022 due to the clearing, grading, or destruction of up to 60 acres of habitat that is otherwise covered within the SDG&E Subregional NCCP Plan Area (SDG&E 2017).

City of San Diego General Plan

The City of San Diego General Plan was adopted in 2008. The objective of the plan's Conservation Element is to provide for the long-term conservation and sustainable management of the City's natural resources. This element contains policies for sustainable development; preservation of open space, natural landscapes, and native plants and wildlife; management of resources; and other initiatives to protect public health, safety, and welfare. To achieve this goal, the Conservation Element contains recommendations for reducing impacts on sensitive resources and goals intended to maintain consistency with the MSCP, including a "no net loss" provision for wetlands conservation, promoting habitat recovery within aquatic ecosystems, retaining significant mature trees, and incorporating tree planting into mitigation for environmental impacts. (City of San Diego 2009)

City of San Diego Municipal Code

The City of San Diego Municipal Code contains ordinances intended to protect sensitive biological resources through a series of regulatory measures. The ordinances described in Chapter 14, Article 3, Division 1 pertain specifically to Environmentally Sensitive Lands that support sensitive biological resources, including all wetlands, and upland areas included in the City of San Diego MSCP Preserve; lands outside the MHPA that contain Tier I, II, IIIA, or IIIB Habitats; and lands that support rare, threatened, endangered, narrow endemic, or otherwise covered species. For example, development projects within wetland areas as described above shall incorporate agency-recommended (USACE, USFWS, CDFW, CCC) mitigation and impact minimization strategies to protect these resources, including a minimum 100-foot buffer surrounding wetland features, though a lesser or greater buffer may be determined to be acceptable depending on the sensitivity of each individual feature. The Municipal Code additionally prohibits temporary disturbance or storage of material or equipment within Environmentally Sensitive Lands except within approved areas, and when the disturbance and/or storage will not permanently degrade habitat. (City of San Diego 2012, 2018)

City of San Diego Regional Subareas

The City of San Diego divides the municipal area into regional subareas. Each subarea functions as its own planning area to fit region-specific needs. The proposed project traverses four subareas: Torrey Pines, Torrey Hills, Via de la Valle, and North City Future Urbanizing Area. The City of San Diego transfers coastal zone planning and development decisions to each local subarea within the coastal zone with an approved Coastal Development Plan. Additionally, the individual subarea plans identify similar sensitive biological resources (aquatic features, habitat, and native vegetation), and share multiple policy goals pertaining to those resources, including conserving habitat, aquatic resources, wildlife corridors, and linkages, incorporating avoidance strategies such as buffers, setbacks, and erosion control measures, and revegetation and restoration methods into planning and development projects, and rerouting or removing existing infrastructure including utility realignments from within biologically sensitive areas. Policies specific to each subarea with respect to the proposed project and biological resources are described below.

Torrey Pines Community Plan

Most of the project area south of Via De La Valle and west of I-5 is within the Torrey Pines Community. The Open Space and Resource Management Element of the Torrey Pines Community Plan requires that all Torrey pine trees (*Pinus torreyana*) situated on public property be preserved and protected. Additionally, the Los Peñasquitos Lagoon Enhancement Plan and Program, as described in the Torrey

1 Pines Community Plan, requires that CDP applicants for projects located within the Los Peñasquitos
2 Lagoon watershed pay a Los Peñasquitos watershed restoration and enhancement fee to the Los
3 Peñasquitos Lagoon Fund. This agreement shall be made between the developing party, the City of San
4 Diego, and the State Coastal Conservancy. (City of San Diego 2014a)

5
6 Torrey Hills Community Plan

7 The Open Space and Resource Management Element of the Torrey Hills Community Plan requires that
8 development in identified wetland areas be consistent with the County of San Diego Resource Protection
9 Ordinance, which regulates development in “sensitive” areas, including floodways, floodplains, wetlands,
10 wetland buffer areas, and biologically sensitive areas, which include sensitive habitat areas and areas that
11 support sensitive vegetation communities such as coastal sage scrub communities. The Planning Context
12 chapter of the Torrey Hills Community Plan establishes 100-foot buffer requirements between wetlands
13 and new development, and requires that development projects within the coastal zone be consistent with
14 the goals and policies described in plans, permits, and processes by applicable lead agencies.
15 Additionally, CDP applicants for projects located within the Los Peñasquitos Lagoon watershed pay a
16 Los Peñasquitos watershed restoration and enhancement fee to the Los Peñasquitos Lagoon Fund in an
17 agreement between the developer, the City of San Diego, and the State Coastal Conservancy. (City of San
18 Diego 2014b)

19
20 Via De La Valle Specific Plan

21 The Resource Management Element of the Via De La Valle Specific Plan includes policies aimed to
22 preserve certain native natural communities (chamise chaparral, mixed chaparral, coastal sage scrub,
23 including Diegan coastal sage scrub, and Maritime succulent scrub) within the subarea. To achieve this
24 goal, the plan recommends that developers utilize sculptured grading techniques stabilized with native
25 plant species, and prohibits altering slopes greater than a 25 percent grade that support coastal mixed
26 chaparral and coastal sage scrub. (City of San Diego 2007)

27
28 North City Future Urbanizing Area Framework Plan

29 The Open Space Element of the North City Future Urbanizing Area Framework Plan identifies sensitive
30 biological resources within the subarea, and promotes preserving large habitat resources linked by
31 wildlife corridors. The policies described in the plan are intended to protect sensitive biological resources
32 from human activities and development that could interfere with biological diversity, in accordance with
33 the City of San Diego’s Environmental Tier Project. (City of San Diego 2014c)

34
35 The Community Plan for the City of Del Mar, California

36 The Environmental Management, Community Development, and Precise Plans sections of the City of Del
37 Mar Community Plan contain objectives and policies intended to preserve biological resources within the
38 community, including aquatic resources, native vegetation, and wildlife, by minimizing disturbance or
39 erosion associated with development projects. It also aims to retain and enhance natural benefits within
40 the San Dieguito River floodway and lagoon habitat by preserving the river mouth region. (City of Del
41 Mar 1985)

City of Del Mar Municipal Code

Chapter 8.12 of the City of Del Mar Municipal Code pertains to all portions of the San Dieguito Lagoon and the San Dieguito River at or below the mean high tide line east of the Camino Del Mar Bridge to the eastern City boundary, including all adjacent publicly owned properties that are known to contain sensitive habitat resources. The City of Del Mar Municipal Code prohibits the removal and/or take of any living or non-living marine resources from this area, and restricts vehicle access within these areas. (City of Del Mar 2018)

City of Del Mar Climate Action Plan

The City of Del Mar Climate Action Plan aims to reduce manmade climate-related impacts through the enforcement of mandated measures that will ensure a safe and healthy climate for future citizens (City of Del Mar 2016). Measures include monitoring coastal wetland/river habitats that filter polluted runoff, preserving and restoring native habitats, and encouraging the use of native species in landscaping while monitoring and controlling invasive species in the area.

Public Tree Policy Manual for the City of Del Mar

Section 5 of the City of Del Mar Public Tree Policy Manual establishes specific regulations intended to preserve and protect public trees within the city's public forest during construction by prohibiting excessive pruning, topping, and other actions that could damage the tree (City of Del Mar 2004). The manual describes standards and regulations associated with permitted pruning activities, including the timeline and process by which the applicant must obtain an Encroachment Permit prior to performing any work on a public tree.

City of San Diego Public Tree Protection Policy

In 2005, the City of San Diego adopted a Public Tree Protection Policy, which requires that any pruning of public trees within the public right-of-way, in parks, and on publically owned lands must occur under the guidance of a licensed arborist, and may commence only with written approval by the City Arborist. It recommends that CPUC projects avoid excessive pruning, topping, or tree removal associated with utility line clearance. If such removals are necessary to prevent damage to utility infrastructure, the removal may only occur once the City of San Diego Urban Forester determines that the threat cannot be minimized through other measures. (City of San Diego 2005)

5.4.5 Environmental Impacts and Assessment

Approach to Impact Assessment

The impact analysis for biological resources was conducted by: (1) gathering and evaluating information obtained from the applicant and numerous other sources; and (2) assessing the potential temporal and spatial effects on habitats and organisms within the project area and the region as a whole. Recent survey data provided by the applicant were assessed for accuracy and appropriate implementation of resource agency protocols. Calculations for disturbance to habitat were based on projections of land disturbance from project features (i.e., temporary work areas, helicopter drop zones, aboveground facilities, access areas, etc.).

Significance Criteria

Table 5.4-11 includes the significance criteria from Appendix G of the CEQA Guidelines' biological resources section to evaluate the environmental impacts of the proposed project.

Table 5.4-11 Biological Resources Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, 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 California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Operations and maintenance activities would be restricted to existing duct banks within an existing utility ROW along a road. Occasionally, maintenance activities may be required at underground splice vaults, new structure operation work pads, and hand holes, though maintenance activities would be similar to those already undertaken in the existing utility ROW, and would not present a substantial change from existing conditions that would have impacts on biological resources within the project area. Upon completion, removal of Line TL666D would eliminate the need to conduct operations and maintenance activities within San Dieguito Lagoon and Los Peñasquitos Lagoon, resulting in an overall decrease in potential impacts to biological resources within the lagoons, including a reduction in risk of bird electrocution on overhead power lines. There are therefore no anticipated project-related impacts to biological resources with respect to operations and maintenance activities.

Approach to Reducing Impacts

In the PEA, the applicant included Operational Protocols, Habitat Enhancement Measures, and applicant-proposed measures (APMs) that are intended to minimize potential project-related impacts to biological resources. The Operational Protocols described in Section 7.1 of SDG&E's NCCP and the Habitat Enhancement Measures described in NCCP Section 7.2 are Best Management Practices (BMPs) intended to minimize project-related impacts to biological resources. A full list of all Operational Protocols and Habitat Enhancement Measures applicable to the proposed project can be found in SDG&E's Subregional NCCP.

The APMs included in the Applicant's PEA have been incorporated with modification into the following mitigation measures (MMs) to avoid or feasibly minimize effects to biological resources.

SDG&E has prepared APM-BIO-09, which addresses survey requirements for roosting bats. This measure is adopted without modification. APM-BIO-09 and the MMs resulting from the adoption with modification process are included below. A list of all project APMs that have been incorporated into all project MMs, including those described below, is included in Table 4-9.

MM BR-1: Preconstruction Surveys. Thirty days prior to the start of construction activities in new work areas that have the potential to impact biological resources (e.g., staging, vegetation clearing, trenching, helicopter activities, pole removal, stringing, stockpiling), a CPUC-approved biologist shall conduct preconstruction surveys for sensitive biological resources within all qualifying work areas, including access roads, footpaths, fly yards, stringing sites, pole removal sites, etc. In efforts to minimize the extent of human activities within San Dieguito Lagoon and Los Peñasquitos Lagoon while maintaining worker safety, preconstruction surveys in the lagoon areas will be conducted from a safe distance that still allows for adequate biological observation (via binoculars or other means). Lagoon areas that are accessible by foot shall undergo standard preconstruction surveys. If construction activities halt within a work area for fourteen days, the biological monitor shall recheck the work area for any sensitive biological resources prior to the re-commencement of construction activities. Avian surveys shall be conducted in accordance with SDG&E's Subregional NCCP as well as all other applicable requirements, as described in MM BR-6: Nesting Bird Management Plan. Prior to the start of daily project-related activities within all work areas, all areas with habitat suitable to support special status plants and wildlife, and all areas and places in which wildlife could become trapped (trenches, holes, excluded areas, etc.) shall undergo a daily biological clearance sweep, to be conducted by a qualified, CPUC-approved biological monitor. Only after verbal clearance by the biological monitor may project-related activities commence within work areas.

MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas (ESHAs, Jurisdictional Features), and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed prior to the start of construction activities. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features.

To minimize the potential for human-related impacts in sensitive areas, fencing, flagging, or signage shall not be required in helicopter access-only work areas within San Dieguito Lagoon or Los

Peñasquitos Lagoon. However, as described in MM BR-4, a CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. In work areas located outside of the lagoons or within the lagoons by fully accessible by foot, in which construction activities are anticipated to last less than one day, fencing and flagging installation will not be required, but a CPUC-approved biological monitor must be present to observe construction activities per MM BR-4. Equipment such as PVC conduit, which could potentially entrap wildlife, shall be inspected by a qualified, CPUC-approved biological monitor prior to use. Areas that would be subject to excavation (e.g., trenches and holes), shall be excluded and fully covered at the end of each day to prevent wildlife from falling in and becoming entrapped. If a trench or hole cannot be fully covered at the end of the day for any reason, the applicant shall install wildlife escape ramps at least every 100 feet, which shall have slopes no greater than 2:1.

Environmentally Sensitive Areas (areas with substantial biological resources such as special status species, sensitive natural communities, occupied and/or suitable habitat, or aquatic features), including Environmentally Sensitive Habitat Areas (ESHAs) and potentially jurisdictional aquatic features (under USACE, CDFW, RWQCB, and/or CCC jurisdiction), shall be clearly flagged, fenced, and/or indicated by signage to prevent inadvertent disturbance or trampling. Adequate buffer distances surrounding Environmentally Sensitive Areas shall be determined by the CPUC-approved biological monitor, based on the biological sensitivity of the resource and the nature of the approved project-related activities occurring nearby. Buffers between staging areas, stringing sites, and both ESHAs and wetland areas shall be no less than 50 feet, unless it is determined by the onsite, CPUC-approved biologist that a lesser buffer distance is appropriate. Buffer distance reduction requests must be directed to the CPUC, and should involve consultation with relevant agencies (USFWS, USACE, CDFW, and/or CCC) as needed.

MM BR-3: Worker Training Program. The applicant shall develop a Worker Environmental Awareness Program (WEAP), to be submitted to the CPUC for review and approval, that shall be administered to all project-related staff who will conduct on-site work (e.g., construction crews, management, monitors, contractors, sub-contractors, etc.). The applicant shall submit to the CPUC monthly documentation of who has undergone WEAP training. The WEAP shall describe the sensitive biological resources (plants, wildlife, and sensitive natural communities) that crews may encounter onsite, mitigation measures that shall be used to reduce impacts to these resources, the penalties associated with violations of the conditions of the IS/MND, acquired permits, and SDG&E's best management practices (BMPs). Additionally, the applicant shall develop an informational handout or booklet ~~for each employee~~ that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.

MM BR-4: Construction Monitoring. The applicant shall ensure that a qualified, CPUC-approved biological monitor is present at all times to monitor ground-disturbing activities (e.g., grading, vegetation removal, trenching, digging, etc.) in areas that have the potential to support special status species. All ground-disturbing activities that would occur within 50 feet of Environmentally Sensitive Areas (areas supporting special status species, sensitive natural communities, and aquatic features), ESHAs, and all potentially jurisdictional aquatic features (non-wetland waters of the state, wetlands, streambeds, open water, tidal waters, and jurisdictional natural communities) will be monitored. To minimize the potential for human-related impacts in sensitive areas and to maintain worker safety, a

biological monitor shall not be present to observe project activities within helicopter access-only work areas in San Dieguito Lagoon or Los Peñasquitos Lagoon. The CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. When the CPUC-approved biological monitor must observe project activities from a safe distance, the monitor will maintain communication with pole removal technicians, both before and after each workday, to ensure that appropriate biological resource protection protocols are implemented. In work areas located outside of the lagoons, including upland habitat within Torrey Pines State Natural Reserve Extension, and in work areas ~~or~~ within the lagoons ~~by~~ but fully accessible by foot, the CPUC-approved biological monitor shall be present to observe project activities as described above. Areas within existing pavement that do not have the potential to support special status species will receive a pre-construction survey and spot-checks, as determined by the biological monitor in accordance with SDG&E's NCCP. The biological monitor shall have temporary stop-work authority if he or she determines that project-related activities present a threat to sensitive biological resources. If the biological monitor must stop work due to threat to a biological resource, work may resume once the biological monitor determines that activities will no longer risk or endanger the resource, or upon further consultation with the appropriate agencies (CDFW, USFWS, USACE, RWQCB, or CCC).

~~MM BR-5: Natural Communities; Plant Protection Plan; Tree Protection and Preservation Plan.~~ Natural Communities, Protected Tree, and Plant Protection Plan. To minimize project-related impacts to natural communities, protected trees, and special status plants, SDG&E shall adhere to the enhancement and restoration components of the ~~NCTPP~~ Natural Communities, Protected Tree, and Plant Protection Plan (Plan), including the Quality Assurance restoration protocols described in Chapter 7.2 Habitat Enhancement Measures. Additionally, prior to construction, the applicant shall ensure that special status plant surveys are conducted during appropriate phenological (blooming) periods within one year prior to the start of construction to ensure detection. If detected, special status plants shall be flagged for avoidance. All reasonably accessible Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*) observed ~~within 50 feet of~~ directly adjacent to, ~~or within, or proximal to,~~ proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction. This measure applies to Del Mar manzanita plants that could be inadvertently accessed and impacted by project activities, and does not apply to Del Mar manzanita plants that are difficult to access and that would be unlikely to be reached by construction crews or equipment. Additionally, no fewer than ~~fourteen~~ 30 days prior to the start of construction, the applicant shall develop and submit the Plan to the CPUC, which shall include, at a minimum, the following:

- A Restoration Strategy, including a long-term monitoring strategy, for each protected tree species and special status plant species that is known to occur within or near (within 50 feet of) proposed work areas, and that therefore could be impacted by proposed project activities. If a single restoration strategy and/or long-term monitoring strategy would be effective for multiple species or groups of species, the discussion may include all applicable species, as appropriate long-term monitoring strategies should ensure successful restoration and recolonization by the intended species.
- Restoration and long-term monitoring plans for natural communities, including aquatic features and ESHAs that may experience project-related impacts.
- A Noxious and Invasive Weed Control Strategy to prevent the colonization of noxious and invasive weeds in areas disturbed by proposed project activities. The strategy shall include a

procedure for washing, inspecting, documenting, and approving vehicles and equipment prior to being staged anywhere within the project area.

- Methods of communication between the applicant, the CPUC, and local qualified city arborists to discuss which protected trees, if any, may require trimming before or during project construction, and which protected trees may be subjected to construction activities within 20 feet of the Dripline Area.

Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP Plan shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, protected trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet of) of a work area, SDG&E must avoid the resource and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP Plan within ~~fourteen~~ 30 days of initial observation, for review and approval.

MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections. Additionally, the applicant shall not conduct project-related activities within at least 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), or Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31). A CPUC-approved avian biologist who is knowledgeable about avian species native to the coastal San Diego region shall conduct special status avian surveys where construction would occur during nesting bird season. The avian biologist shall conduct focused avian preconstruction surveys no more than fourteen days before project activities begin in each workspace, in areas containing or adjacent to suitable habitat for special status avian species. For project areas within 500 feet of or within suitable habitat for Western Snowy Plover (*Charadrius alexandrinus nivosus*), the surveying avian biologist must have documented experience surveying Western Snowy Plover. Surveys shall be conducted within work areas plus a buffer large enough to encompass the ~~next~~ nest buffer of any special status avian species for which suitable habitat is present (i.e., 100 to 500 feet). In work areas that contain no suitable or potentially suitable habitat for special status avian species, and that would not be subject to any ground disturbance or vegetation trimming/removal, focused avian preconstruction surveys are not necessary.

If nesting birds are observed ~~within 500 feet of work areas within or adjacent to the lagoons, Torrey Pines State Natural Reserve Extension, ESHAs, or other proposed work areas~~ during focused avian surveys or general preconstruction surveys (see MM BR-1), the avian biologist shall establish appropriate, species-specific vertical and horizontal buffers between project activities and established nests and territories. ~~to be no less than~~ The buffers shall be no less than 500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plover nests (unless otherwise approved by USFWS and/or CDFW). Buffers between project activities and other avian nests shall be established on a species-specific basis, based on USFWS and CDFW recommendations and avian biologist observations. the following distances for each species:

- ~~500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plovers;~~
- ~~300 feet (vertical and horizontal) for all other special status avian species (passerine, waders, etc.); and~~

- ~~• 100 feet (vertical or horizontal) from nests of non-special status avian species.~~

If non-nesting special-status avian species are observed, project activities may resume at distances greater than 100 feet from San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), and Torrey Pines State Natural Reserve Extension during nesting bird season (February 1-August 31), but a CPUC-approved biological monitor must be present. If project activities would occur between 100 and 500 feet of occupied (non-nesting) Western Snowy Plover habitat, then an avian biologist with documented experience surveying Western Snowy Plover must be present to observe all project activities.

~~The nest buffer distances described above~~ Nest buffer distances may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. The applicant shall notify the CPUC, USFWS, and CDFW of nest buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for nest-buffer reductions to special status species and raptor nests and will provide verification to the CPUC of this coordination when reducing such buffers. Nest buffers for common, non-special-status species shall be reduced per protocols established in the Nesting Bird Management Plan (NBMP). ~~Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species.~~ All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.

The applicant shall develop an ~~Nesting Bird Management Plan (NBMP)~~ in accordance with the Avian Power Line Interaction Committee (APLIC) and USFWS guidelines (APLIC and USFWS 2005), to be submitted to the CPUC no fewer than 30 days prior to the start of construction. The plan shall contain, at a minimum, the following information and strategies intended to minimize impacts to avian species:

- Methods from APLIC Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012) that would minimize the risk of avian collisions, injuries, and electrocutions associated with new poles and aboveground utility features, including those associated with the C738 and C510 conversions;
- Species-specific USFWS and/or CDFW survey protocols and planned compliance procedures with the protocol(s);
- Survey timing, methods, and boundaries, protocols for determining whether a nest is active and how to protect active nests, documentation and reporting methods for observed active nests, and surveyor qualifications;
- Nest documentation (nest activity, active/inactive, etc.) and an established procedure for contacting the appropriate agencies (CPUC, CDFW, USFWS) with inactive nest removal requests for review;
- Nesting bird deterrent methods for activities to be conducted outside of the lagoons and Torrey Pines State Natural Reserve, but within nesting bird season;

- Species-specific buffer determinations relating to project components and protocols for requesting a reduced buffer distance from the CPUC and from the wildlife agencies; and
- Language indicating that buffer distances shall be based on biological data and site/species-specific observations, not generalized assumptions.

MM BR-7: Nighttime Lighting Protection. Any lighting required for construction activities, including activities that would occur at staging areas/fly yards, stringing sites, drop zones, and other work areas, shall be minimized to the extent feasible, and shall utilize the lowest illumination necessary for worker safety, in accordance with Occupational Health and Safety Administration standards. Lighting shall be selectively placed, oriented downward, and shielded to minimize offsite light spill. Nighttime lighting in wildlife corridor areas shall be of low-sodium or similar lighting methods, in accordance with the City of San Diego MHPA requirements. Construction equipment and vehicle speeds on unpaved roads during nighttime activities shall be restricted to 15 miles per hour as described in SDG&E's NCCP, and biologists shall conduct vehicle checks for trapped or concealed wildlife prior to moving equipment after dark to minimize strike and collision risk to nocturnal wildlife species. Lights shall not be left on during nighttime hours, except as required for nighttime work and/or an emergency.

MM BR-8: Butterfly Protection. Any tree trimming that would occur during western monarch butterfly overwintering season (September-February) shall be observed by a CPUC-approved biological monitor who is knowledgeable about western monarch butterfly ecology and life history. The monitor shall inspect the tree to determine the presence of overwintering western monarch butterfly, or to determine if the tree has a high potential to support overwintering western monarch butterfly populations, based on tree species and historic overwintering western monarch butterfly occurrences (see Table 5.4-10). Trees may only be trimmed or removed if the biologist determines that they do not support overwintering western monarch butterfly populations. No Torrey pines or eucalyptus trees may be trimmed within San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve Extension, or the locations identified in Table 5.4-10 during overwintering season.

To minimize the potential for impacts to wandering skipper, a Narrow Endemic Species, and in accordance with SDG&E's NCCP, the applicant shall not conduct construction activities within San Dieguito Lagoon or Los Peñasquitos Lagoon during peak flight season (July-September). If construction activities within any work areas (within or outside of lagoon areas) would result in the removal of or damage to the wandering skipper host plant (salt grass) or to native nectar sources known to support western monarch butterfly, the applicant shall restore the nectar sources at a 1:1 ratio, restoring salt grass directly, and restoring monarch butterfly nectar sources either directly, or as described by the California Coast recommendations (Xerces 2016b). Only native milkweed species may be used for restoration.

APM-BIO-09: Prior to construction, a habitat survey for potential bat roosts that may be impacted by construction activities will be conducted. During the survey, potential roost sites will be searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. Up to two weeks prior to construction, a qualified biologist will conduct bat surveys at roost sites identified as potentially active from signs of bat use identified during the survey. If bats are detected, SDG&E will avoid conducting construction activities that may directly impact the active roost site. If an active maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31).

- 1
2 *a. Would the project have a substantial adverse effect, either directly or through habitat*
3 *modifications, on any species identified as a candidate, sensitive, or special status species in local*
4 *or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or*
5 *U.S. Fish and Wildlife Service?*
6

7 **Special Status Plants**

8 There are 51 special status plant species with some potential to occur within the project area (see
9 Appendix C). Of these, 17 species were observed during surveys and are therefore considered to be
10 present within the BSA. Ten species have a high potential to occur within the BSA or within 1 mile of the
11 project area. Direct, construction-related impacts to special status plants could result from vegetation
12 trimming or removal and crushing by vehicles, equipment, or construction personnel. Indirect,
13 construction-related impacts to special status plants, including federally listed species, could result from
14 competition with introduced noxious and invasive weeds; dust, which would interfere with
15 photosynthesis; soil disturbance caused by erosion, sedimentation, or runoff; or other changes in habitat
16 conditions that could make an area that previously supported special status plant species unsuitable for
17 that species post-construction.

18
19 Proposed vegetation removal and trimming would be minimized as part of the proposed project design,
20 and would be restricted to minor trimming along temporary footpaths and existing all-terrain vehicle
21 roads, and surrounding certain pole foundations as needed. In total, approximately 0.3 acres of chaparral
22 vegetation with the potential to support Del Mar manzanita would be impacted within proposed project
23 construction areas. To minimize the potential for impacts to special status plants, the applicant shall
24 implement **MM BR-1**, which would require preconstruction surveys one month prior to the start of
25 construction within each approved workspace to determine the presence of special status plant species,
26 and daily pre-activity clearance sweeps prior to the commencement of daily construction activities.

27
28 **MM BR-2** would require that sensitive biological resources, including special status plants, be
29 demarcated with flagging, fencing, and/or signage to prevent inadvertent encroachment that could crush
30 or otherwise damage special status plants. ~~MM BR-3~~ **MM BR-5** would require that the applicant wash
31 vehicles and equipment prior to staging onsite, and to develop a Weed Control Plan to prevent the
32 colonization of noxious and invasive weeds that could outcompete special status plants in areas disturbed
33 by construction activities. **MM BR-3** would require that the applicant develop a WEAP that would
34 describe to each all project personnel ~~how to identify~~ the biological resources onsite to prevent incidental
35 impacts from trampling, incidental trimming, or misidentification.

36
37 **MM BR-4** would require onsite biological monitoring of construction activities that would occur within
38 ~~100~~ 50 feet of a special status plant species. **MM BR-5** would require the applicant to develop a Natural
39 Community, Protected Tree, and Plant Protection Plan for ~~each~~ sensitive species. The Plan would provide
40 measures to minimize impacts to sensitive plants that would experience unavoidable disturbance
41 associated with proposed project construction.

42
43 As part of the applicant's required Stormwater Pollution Prevention Plan (SWPPP), the applicant would
44 be required to develop strategies and procedures that would minimize impacts to special status plants
45 resulting from erosion, siltation, and/or sedimentation resulting from construction activities. Furthermore,

Proposed Project Design Feature: Fugitive Dust Control would minimize fugitive dust buildup that could potentially accumulate on vegetation, thereby interfering with photosynthesis.

With the implementation the SWPPP and the Project Design Feature, as well as **MM BR-1, MM BR-2, MM BR-3, MM BR-4, MM BR-5, and MM BR-6**, impacts to special status plants would be less than significant.

Special Status Wildlife

There are 92 special status wildlife species with some potential to occur within the project area (see Appendix C). Of these, 24 species were observed during surveys and are therefore considered to be present within the BSA. Twenty-three species have a high potential to occur within the BSA or within 1 mile of the proposed project area. All special-status wildlife species observed within the BSA are avian species (Konecny Biological Services 2014; Blackhawk Environmental, Inc. 2017). No special status amphibians were determined to have a high potential to occur within 1 mile of the proposed project alignment.

Avian Species

During surveys, biologists observed four special status wildlife species (all avian species) that are listed under ESA and/or CESA: Belding's Savannah Sparrow (*Passerculus sandwichensis beldingi*), California Least Tern (*Sterna antillarum browni*), Light-Footed Ridgway's Rail (*Rallus longirostris levipes*), and Coastal California Gnatcatcher (*Poliopitila californica californica*) (see Table 5.4-1) (Konecny Biological Services 2014; Blackhawk Environmental, Inc. 2017). An additional 15 avian non-ESA/CESA species were observed within the BSA that are listed under other designations (SCC, BCC, FP, WL, BGEPA, MSCP) (see Table 5.4-4). Special status (non-ESA/CESA) raptor species observed during surveys include American Peregrine Falcon (*Falco peregrinus anatum*), Cooper's Hawk (*Accipter cooperi*), Northern Harrier (*Circus cyaneus*), and White-Tailed Kite (*Elanus Leucurus*). Observed special status (non-ESA/CESA) avian species that are primarily aquatic (waders, gulls, and primarily pelagic species known to occur rarely onshore) include American White Pelican (*Pelecanus erythrorhynchos*), California Brown Pelican (*Pelecanus occidentalis californicus*), Least Bittern (*Ixobrychus exilis*), Long-Billed Curlew (*Numenius americanus*), Reddish Egret (*Egretta rufescens*), Whimbrel (*Numenius phaeopus*), and White-Faced Ibis (*Plegadis chihi*). Other special status (non-ESA/CESA) passerine (songbird) and non-passerine species observed within the project area are Allen's Hummingbird (*Selasphorus sasin*), Clark's Marsh Wren (*Cistophorus palustris clarkae*), Costa's Hummingbird (*Calypte costae*), and Yellow Warbler (*Setophaga Petechia*).

Impacts to any of the 23 avian species that have a high potential to occur within the project area (see Table 5.4-4) or to any other special status avian species that have potential occur within the project area (see Appendix C) would be significant due to their special status designation. Burrowing Owl is a special status (non-ESA/CESA) raptor species that has a high likelihood of occurrence within the project area. Special status (non-ESA/CESA) avian species that are primarily aquatic (waders, gulls, and primarily pelagic species known to occur rarely onshore) and that have a high likelihood of occurrence within the project area include Black Skimmer (*Rynchops niger*), Elegant Tern (*Thalasseus elegans*), Gull-Billed Tern (*Gelochelidon nilotica*), Marbled Godwit (*Limosa fedoa*), Short-Billed Dowitcher (*Limnodromus girseus*), and Western Snowy Plover (nesting populations). While not observed during nesting season

surveys, Western Snowy Plover is known to occur within 1 mile of the project area, and there is a segment of critical habitat for this species within San Dieguito Lagoon, and non-critical suitable habitat for this species elsewhere in the lagoon. Other special status (non-ESA/CESA) passerine (songbird) species with a high likelihood to occur within the project area are Grasshopper Sparrow (*Ammodramus Savannarum Perpalidus*), Large-Billed Savannah Sparrow (*Passerculus sandwichensis rostratus*), Lawrence's Goldfinch (*Spinus lawrencei*), Least Bell's Vireo (*Vireo bellii pusillus*), Loggerhead Shrike (*Lanius ludovicianus*), Southern California Rufous-Crowned Sparrow (*Aimophila ruficeps canescens*), Tricolored Blackbird (*Agelaius Tricolor*; a CESA-candidate species), Vermilion Flycatcher (*Pyrocephalus rubinus*), Western Bluebird (*Sialia Mexicana*), and Yellow-Breasted Chat (*Icteria Virens*). Biologists observed a common yellowthroat individual during a February site visit, but were unable to identify it to subspecies. Saltmarsh/San Francisco Common Yellowthroat (*Geothlypis trichas sinuosa*) is therefore also considered to have a high potential to occur within the project area.

Direct construction-related impacts to any of these species would include vehicle strikes (including helicopter strikes), which could result in injury or fatalities, nest disruption, or disturbance due to construction-related noise or lighting that could potentially lead to nest abandonment or failure. Indirect construction-related impacts to these species would include habitat degradation resulting from damaging, trimming, or removing vegetation within suitable foraging or breeding habitat, and sedimentation or siltation resulting from construction runoff into suitable foraging and/or breeding habitat. These impacts, and impacts to any non-special status avian species that is protected under the MBTA, would be significant.

To minimize the potential for impacts to special status avian species, the applicant shall adhere to **MM BR-1**, which requires daily pre-activity biological clearance sweeps prior to the commencement of daily construction activities, which would determine the presence of special status avian species within or adjacent to proposed project work areas.

MM BR-3 would require that the applicant develop a WEAP that would describe to ~~teach~~ all project personnel ~~how to identify~~ the biological resources onsite to prevent incidental impacts from trampling, incidental trimming, or misidentification.

MM BR-4 would require onsite biological monitoring of construction activities that would occur within ~~400~~ 50 feet of ESHAs and habitat occupied by special status species. **MM BR-5** requires that the applicant avoid or restore special status plant species that may provide suitable habitat for avian species, therefore helping maintain suitable avian habitat within disturbed areas upon completion of the proposed project.

MM BR-6 prohibits construction activities within or within ~~500~~ 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Reserve Extension during Nesting Bird Season (February 1 to August 31). It additionally requires avian-specific preconstruction surveys 14 days prior to the start of ground-disturbing activities in areas with the potential to support special status avian species, and requires the development of an Nesting Bird Management Plan, which would contain additional measures, such as horizontal and vertical buffers, that would minimize potential risks to avian species. Furthermore,

MM BR-7 restricts potentially disturbing construction-related nighttime lighting to exclusively occasions

when it is required for project and personnel safety, and requires that lighting be directed downward and shielded to prevent spilling into potentially occupied habitat.

As part of the applicant's required SWPPP, the applicant would be required to develop strategies and procedures that would minimize erosion and construction-related runoff into suitable foraging and/or nesting habitat for special status species, and would additionally require that equipment be staged and fueled outside of the lagoon areas, reducing the risk of fuel spills in aquatic habitat areas.

With the implementation of **MM BR-1**, **MM BR-4**, **MM BR-5**, **MM BR-6**, and **MM BR-7**, impacts to special status avian species would be less than significant.

Reptiles

Two special status reptiles (Belding's orange-throated whiptail [*Aspidoscelis hyperythra beldingi*] and San Diego tiger whiptail [*Aspidoscelis tigris stejnegeri*]) were observed within the BSA, and three special status reptiles (coast horned lizard [*Phrynosoma blainvillei*], Coronado skink [*Plestiodon skitonianus interparietalis*], and San Diego ringed-neck snake [*Diadophis punctatus similis*]) were determined to have a high potential to occur. None of the five special status reptile species are listed under ESA or CESA, and all five are known to occur in chaparral natural communities, and in other natural communities known to occur within the project area (sage scrub communities, brush, woodlands, and grasslands). Project-related impacts to these species would result from getting crushed or struck by vehicles, equipment, or workers, disruption or disturbance resulting from construction-related noise or lighting, especially for nocturnal species, habitat degradation in the form of vegetation trimming or removal, and sedimentation or siltation resulting from construction runoff, which would degrade habitat.

To minimize the potential for impacts to special status reptile species, the applicant shall adhere to **MM BR-1**, which would require preconstruction surveys and daily biological clearance sweeps by a CPUC-approved biologist familiar with herpetofauna of coastal Southern California to determine the presence of either species within the greater project area, and within daily work areas.

MM BR-3 would require the applicant to develop a WEAP, which would contain identification information regarding reptile species with the potential to occur onsite, and snake safety procedures to educate and prevent worker-snake conflicts. **MM BR-4** requires onsite biological monitoring of all ground-disturbing activities, including ground-disturbing activities that would occur within ~~400~~ 50 feet of ESHAs, including chaparral and coastal sage scrub communities with the potential to support these special status reptile species, and habitat known to be occupied by special status reptile species.

MM BR-7 would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb or disorient special status reptiles downward, preventing spills from workspaces into occupied habitat. **MM BR-7** additionally restricts project-related vehicles to an operating speed no faster than ~~40~~ 15 mph and requires vehicle checks for wildlife prior to moving equipment, which would reduce the risk of accidental vehicular collisions with nocturnal special status reptiles. Additionally, Section 7.1 Operational Protocols in SDG&E's NCCP (see Section 5.4.5.2 in this report) restricts onsite (daytime) vehicles speeds to no faster than 15 mph, further minimizing the risk of accidental vehicular collisions with diurnal special status reptiles.

With the incorporation of **MM BR-1**, **MM BR-3**, **MM BR-4**, and **MM BR-7**, project-related impacts to special status reptile species would be less than significant.

Mammals

One special status mammal listed under the City of San Diego MSCP (southern mule deer [*Odocoileus hemionus fuliginata*]) was observed within the BSA, and two special status mammals (San Diego pocket mouse [*Chaetodipus fallax fallax*] and pocketed free-tailed bat [*Nyctinomops femorosaccus*]) were determined to have a high potential to occur. None of the three special status mammals are listed under ESA or CESA. Project-related impacts to these species would result from getting crushed or struck by vehicles, equipment, or workers, disruption or disturbance resulting from construction-related noise or lighting, especially for species that are active during nighttime, habitat degradation in the form of vegetation trimming or removal, and sedimentation or siltation resulting from construction-related runoff into habitat.

To minimize the potential for impacts to special status mammal species, the applicant shall adhere to **MM BR-1**, which would require preconstruction surveys and daily biological clearance sweeps by a CPUC-approved biologist familiar with Southern Californian mammals to determine the presence of either species within the greater project area, and within daily workspaces. **MM BR-3** would require that the applicant develop a WEAP that would describe to teach all project personnel ~~how to identify~~ the biological resources onsite to prevent incidental impacts from trampling, incidental trimming, or misidentification. **MM BR-4** requires onsite biological monitoring of all ground-disturbing activities to ensure that project-related activities do not conflict with special status mammals. **MM BR-5** would require the applicant to develop a Natural Community, Protected Tree, and Plant Protection Plan. The Plan would provide measures to minimize impacts to sensitive plants that would experience unavoidable disturbance associated with proposed project construction. for each plant species that would experience unavoidable disturbance associated with proposed project construction, which would restore suitable habitat for special status mammal species to pre-project conditions. **MM BR-7** would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb or disorient special status mammals downward, preventing spill from workspaces into occupied habitat. **MM BR-7** additionally restricts project-related vehicles to an operating speed no faster than ~~40~~ 15 mph, and requires vehicle checks for wildlife prior to moving equipment, which would reduce the risk of accidental vehicular collisions with nocturnal special status mammals. Additionally, Section 7.1 Operational Protocols in SDG&E's NCCP (see Section 5.4.5.2 in this report) restricts onsite (daytime) vehicles speeds to no faster than 15 mph, further minimizing the risk of accidental vehicular collisions with diurnal special status mammals. Additionally, **APM-BIO-09** provides bat-specific protections, including preconstruction bat roost surveys and avoidance strategies which would protect pocketed free-tailed bats. With the incorporation of **MM BR-1**, **MM BR-3**, **MM BR-4**, **MM BR-5**, **MM BR-7**, and **APM-BIO-09**, project-related impacts to special status mammal species would be less than significant.

Invertebrates

Wandering (saltmarsh) skipper and western monarch butterfly were both observed within the project area during 2014 and 2017 focused wandering skipper surveys. Wandering skipper is protected under the City of San Diego MSCP, and the western monarch butterfly is a non-listed species under applicable jurisdictions, but is a Group 2 species on the County of San Diego Sensitive Animal List (County of San Diego 2010), and is of recent concern due to declining overwintering populations and fragmented habitat. The western monarch butterfly has therefore been included in this discussion as part of a conservative

analysis intended to minimize project-related impacts to biological resources. Project-related impacts to wandering skipper and western monarch butterfly would occur if construction activities were to degrade or destroy suitable nesting, breeding, foraging, or roosting habitat, including impacts associated with the removal of or damage to nectar sources, caterpillar host plants, or habitat. Additional impacts could result from vehicle strikes, and from disturbance associated with project-related noise and lighting.

To minimize potential project-related impacts to the wandering skipper and western monarch butterfly, the applicant shall adhere to **MM BR-3**, which would require the applicant to develop a WEAP, which would contain identification information for both wandering skipper and western monarch butterfly, and salt grass (wandering skipper's caterpillar host species) and common overwintering western monarch butterfly nectar sources native to the area (Xerces 2016b). ~~MM BR-4~~ **MM BR-8** would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.

MM BR-7 would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat, or into suitable wandering skipper habitat documented south of Via de la Valle. Combined, these measures would reduce impacts on wandering skipper and western monarch butterfly to less than significant.

MM BR-8 would require a biological monitor to be present during trimming of trees in areas that could support overwintering western monarch butterfly populations in approved areas, and prohibits the removal of wandering skipper host plant species during flight season, further minimizing the potential for impacts to butterfly species.

Significance: Less than Significant with Mitigation Incorporation

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The proposed project alignment spans substantial riparian habitat, including the San Dieguito River, and sensitive natural communities within San Dieguito Lagoon and Los Peñasquitos Lagoon. Because completion of the proposed project would involve the removal of existing utility infrastructure from these sensitive habitat areas, there are no anticipated substantial adverse effects associated with operations and maintenance activities. However, aspects of the proposed project construction could substantially interfere with the ecological functioning of these areas. Construction activities such as staging adjacent to riparian and sensitive natural communities, dragging the removed TL666D overhead wire through vegetation, and landing helicopters within sensitive natural communities could temporarily degrade riparian habitat and other sensitive natural communities. Additionally, poles that are felled in lagoon areas would crush vegetation within sensitive natural communities, which could temporarily degrade the habitat. Furthermore, post-project colonization of noxious and invasive weeds within areas disturbed by construction activities could substantially degrade the existing sensitive natural communities, and would interfere with ecosystem function. Project activities adjacent to sensitive natural communities could also degrade the surrounding communities if construction materials were to run offsite into nearby habitat. Finally, particulate matter resulting from trenching, grading, and material moving could settle offsite on

vegetation within sensitive natural communities, interfering with photosynthesis and ecosystem function, including resource availability for wildlife species.

Table 5.4-12 describes the acres of sensitive natural communities, including riparian communities, within proposed project workspaces. Because all project-related biological resource impacts would be temporary and short term, only known and potential acreages associated with these impacts are described. The exact location and acreage of temporary impacts to each natural community cannot be fully determined at this time, because the exact location of the footprint associated with overhead wire-dragging cannot be identified prior to actual wire removal, similarly the footprint area associated with pole felling and helicopter drop zones would be determined in the field based on safety and site conditions. “Potential Temporary Impacts,” therefore, refer to the entire possible footprint (in acres) in which a more limited scope of impact (from activities such as walking, pole felling, etc.) could occur. Impacts to jurisdictional waters, such as those resulting from dredging and filling activities, are not included as part of the proposed project.

Table 5.4-12 Potential Temporary Impacts on Sensitive Natural Communities in Project Work Areas

Natural Community ^(a)	Sensitivity Ranking/Tier	Total Acres in Work Areas	Potential Temporary Impacts (acres)	Temporary Impacts (acres)
Torrey Pine Forest	S1 / Tier I	0.2	--	0.2
Scrub Oak Chaparral	S3 / Tier I	0.2	--	0.2
Southern Maritime Chaparral	S1 / Tier I	0.2	--	0.2
Southern Mixed Chaparral	S3 / Tier III	0.1	--	0.1
Diegan Coastal Sage Scrub	S3 / Tier II	0.2	<0.1	0.2
Southern Arroyo Willow Riparian Forest	S2 / Tier I	<0.1	<0.1	<0.1
Coastal and Valley Freshwater Marsh	S2 / Tier I	0.8	0.7	0.1
Coastal Salt Marsh, including Southern Coastal Salt Marsh	S2 / Tier I	4.1	3.4	0.7
Open Water, Saltpan/Mudflats, Beaches	-- / --	0.7	0.1	0.6
Total		6.5	4.2	2.3

Note:

^(a) For the purpose of this analysis, all natural communities within Table 5.4-12 are considered ESHAs, and impacts are therefore analyzed as such. Project Area ESHAs are further described in Section 5.4.3.3 “Environmentally Sensitive Habitat Areas.”

To allow for full disclosure of potential temporary impacts, the applicant provided workspace dimensions of 0.1 to 0.2 square acres for each pole felling area, and 0.1 to 0.2 square acres for each helicopter drop zone (10 by 10 feet or 16 by 16 feet). Impacts may occur anywhere within these work areas, as each 70 by 3.25-foot pole with a horizontal cover of approximately 0.005 acre would fall somewhere within the designated 0.1- to 0.2-acre pole felling area. To maintain a conservative yet realistic approach to the temporary impacts analysis, each pole was flanked by two 0.005-acre pole felling footprints within each pole felling area, to allow for flexibility in felling direction, and one 0.2-acre (16- by 16-foot) helicopter drop zone. This approach accounts for temporary impacts to sensitive natural communities within two potential falling sites, and within one conservative helicopter drop zone.

Additionally, temporary impacts assumed a 1-foot-wide footprint to account for anticipated temporary impacts resulting from dragging the removed overhead TL666D wire across sensitive natural communities after it is removed from poles. In Table 5.4-12, potential temporary impacts are the impacts

assuming full temporary disturbance within all disclosed work areas. Temporary impact values provide a conservative measure of actual disturbance footprints within work areas, based on pole and helicopter size. Actual temporary impacts resulting from helicopter use, pole felling, and wire dragging are expected to be slightly less than the total value described in Table 5.4-12, because the analysis conservatively assumes temporary impacts based on all helicopter landing zones being 16 by 16 feet (0.2 acres), and assumes two 0.005-acre falling footprints for every one pole.

To minimize the potential for impacts to 2.3 acres of riparian habitat and sensitive natural communities, including ESHAs, the applicant shall implement **MM BR-2**, which requires that all Environmental Sensitive Areas, including ESHAs and other communities that are jurisdictional under USACE, CDFW, RWQCB, and/or CCC, be demarcated with flagging, fencing, and/or signage to prevent inadvertent encroachment that could crush vegetation or otherwise degrade the ecological functioning of the community. **MM BR-2** additionally requires that buffers between staging areas, stringing sites, and wetland areas be no less than 50 feet, or 100 feet from the Los Peñasquitos Lagoon for the Torrey Pines Fly-Yard, unless it is determined that a smaller buffer distance is appropriate upon consultation with relevant agencies (USFWS, USACE, CDFW, and/or CCC).

To minimize the potential for noxious weeds to colonize sensitive natural communities disturbed by construction activities, ~~MM BR-3~~ **MM BR-5** would require that the applicant wash vehicles and equipment prior to staging onsite, and requires that the applicant develop a Weed Control Plan to prevent the colonization of non-native species that could outcompete native species within in sensitive natural communities disturbed by construction activities. **MM BR-4** would require onsite biological monitoring of construction activities that would occur within ~~100~~ 50 feet of Environmentally Sensitive Areas including sensitive natural communities and ESHAs.

Furthermore, in accordance with **MM BR-5**, the applicant shall develop a Natural Community, Protected Tree, and Plant Protection Plan. The ~~NCTPP~~ Plan will describe sensitive natural community avoidance methods and their implementation strategies for each sensitive natural community and ESHA that may experience disturbance associated with proposed project construction. The Plan shall also include achievable restoration methods and post-project monitoring strategies that will ensure adequate restoration of impacted natural communities. Additionally, the applicant's required SWPPP would minimize impacts to natural communities resulting from erosion, siltation, and/or sedimentation associated with project construction. Finally, Proposed Project Design Feature: Fugitive Dust Control would minimize fugitive dust buildup that could potentially accumulate on vegetation and potentially interfere with photosynthesis and subsequent ecosystem function, such as availability of resources for wildlife.

With the implementation of **MM BR-2**, **MM BR-3**, **MM BR-4**, and **MM BR-5** and Proposed Project Design Feature: Fugitive Dust Control, impacts to riparian features and sensitive natural communities, including ESHAs, would be less than significant.

Significance: Less than Significant with Mitigation Incorporation

c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed project alignment spans multiple miles of potentially jurisdictional aquatic features, including federally protected wetlands, as defined by Section 404 of the Clean Water Act. While proposed project activities would not result in the removal of these wetlands, nor would materials be added to the wetlands, proposed project activities such as the removal of existing utility lines within jurisdictional waters and/or the installation of new utility lines in trenches adjacent to jurisdictional waters may require a Nationwide Permit under Section 404 of the Clean Water Act, to be determined upon consultation with applicable regulatory agencies including USACE, as described in Section 5.4.4, “Regulatory Setting.” If it is determined that project activities require a Nationwide Permit under Section 404 of the Clean Water Act, or other applicable permits, the applicant shall comply with all determined permit measures.

Because completion of the proposed project would result in the removal of existing utility infrastructure from these features, there are no anticipated substantial adverse effects to wetlands associated with the proposed project operations and maintenance activities. However, aspects of proposed project construction could potentially impact wetlands or non-wetland Waters of the United States, or aquatic features that are jurisdictional under other agencies (CDFW, RWQCB, and/or CCC). Construction activities such as staging adjacent to protected wetlands or non-wetland waters, dragging the removed TL666D overhead wire through jurisdictional waters, and landing helicopters and felling poles within jurisdictional waters could have a temporarily degrade these features. Additionally, when poles are removed from lagoon areas, they would crush vegetation within jurisdictional waters upon falling. Furthermore, project activities adjacent to sensitive natural communities could degrade the surrounding communities if construction materials were to run offsite into nearby habitat.

Table 5.4-13 describes the acres of jurisdictional features within proposed project work areas. The exact location and acreage of temporary impacts to each jurisdictional feature cannot be fully determined at this time, because the exact location of the overhead wire-dragging footprint cannot be identified prior to wire removal, and the exact pole felling footprints and helicopter drop zones would be determined in the field based on safety and site conditions. For a detailed description of the analyses underlying the impact estimates in Table 5.4-13, refer to the discussion under criterion (b) above.

Table 5.4-13 Summary of Impacts to Jurisdictional Features within Proposed Project Work Areas

Jurisdictional Feature Type	Potentially Jurisdictional Natural Community	Regulatory Agencies	Total Acres in Workspaces ^(b)	Potential Temporary Impacts	Temporary Impacts
Wetland	Coastal and Valley Freshwater Marsh	USACE, CDFW, RWQCB, CCC	0.8	0.7	0.1
Wetland	Southern Arroyo Willow Riparian Forest	USACE, CDFW, RWQCB, CCC	<0.1	<0.1	<0.1
Wetland	Southern Coastal Salt Marsh	USACE, CDFW, RWQCB, CCC	4.1	3.4	0.7
Wetland	Coastal Salt Marsh	USACE, CDFW, RWQCB, CCC	<0.1	<0.1	<0.1

Table 5.4-13 Summary of Impacts to Jurisdictional Features within Proposed Project Work Areas

Jurisdictional Feature Type	Potentially Jurisdictional Natural Community	Regulatory Agencies	Total Acres in Workspaces ^(b)	Potential Temporary Impacts	Temporary Impacts
Wetland / Non-wetland Waters ^(a)	Open Water / Beach Saltpan / Mudflat*	USACE, CDFW, RWQCB, CCC	0.7	0.1	0.6
Non-wetland Waters	Bare Ground	USACE, CDFW, RWQCB, CCC	<0.1	<0.1	<0.1
Total ^(c)			5.6	4.2	1.4

Notes:

(a) Open water, beach, and saltpan are considered Non-Wetland Waters of the United States, while mudflat is considered a Wetland Water of the United States.

(b) No federally jurisdictional aquatic features within proposed project workspaces are expected to be subjected to permanent impacts

(c) Totals are approximate due to rounding

Key:

CCC = California Coastal Commission

CDFW = California Department of Fish and Wildlife

RWQCB= Regional Water Quality Control Board

USACE= U.S. Army Corps of Engineers

As described above in Table 5.4-13, fewer than 1.4 acres within a total 5.6-acre footprint of potentially jurisdictional features may experience temporary impacts associated with proposed project activities. These activities would include landing helicopters, crews walking/tracking across vegetation, pole felling, and wire dragging. The approximately 1.4 acres of temporary impacts could occur at slightly different locations within the defined 1-foot-wide wire dragging footprint within San Dieguito Lagoon and Los Peñasquitos Lagoon, and within the approximately 0.1- to 0.2-acre defined helicopter drop zone buffers and pole felling footprint buffers. The 1.4-acre value assumes two approximately 0.005-acre pole felling footprints for each one pole to be removed within San Dieguito Lagoon and Los Peñasquitos Lagoon, and assumes an approximately 0.005-acre helicopter drop zone footprint at each proposed landing location. During construction, proposed project activities would require only one 0.005-acre pole-felling footprint for each pole, and some helicopter drop zone footprints would be only 0.002 acres.

Proposed project construction methods are designed to minimize the potential for impacts to aquatic resources and jurisdictional features. However, required activities within certain areas could potentially temporarily impact 1.4 acres of such features. Table 5.4-8 indicates which potentially jurisdictional aquatic features within the project area occur within workspaces. Features 8, 9, 11–19, and 22–31 may all be subjected to such temporary impacts. No filling, removal, or hydrological interruption are anticipated within these areas, though project-related impacts to vegetation within jurisdictional natural communities such as those described above would be significant, as such impacts could temporarily interfere with the broader ecological role of the jurisdictional community. Temporary impacts could result from damaged vegetation resulting from pole felling, helicopter landing, or wire dragging in jurisdictional features. Because proposed project construction would involve the removal of transmission infrastructure from jurisdictional areas, no project-related operation or maintenance impacts to these jurisdictional features are anticipated.

Some project workspaces such as staging areas/fly yards and stringing sites would be located adjacent to, but not within, potentially jurisdictional features. **MM BR-2** would require that buffers between staging areas, stringing sites, and wetland areas be no less than 50 feet. This required setback would prevent

crews or vehicles from accidentally tracking into jurisdictional areas that are not approved workspaces. Additionally, incorporation of the mandatory SWPPP further minimizes the risk of project-related waste materials and loose soil from running into jurisdictional features by requiring that such materials be 50 feet away from such features. **MM BR-2** additionally requires that a biological monitor be present for project-related activities within sensitive areas including jurisdictional features.

To further minimize construction-related temporary impacts to potentially jurisdictional features, the applicant shall develop a Natural Community, Protected Tree, and Plant Protection Plan, as described in **MM BR-5**, which shall include feasible restoration methods for ESHAs and potentially jurisdictional aquatic features. Described methods should restore these areas to pre-project conditions, and should include restoration monitoring methods to ensure restoration success within areas disturbed by project construction activities. Through the incorporation of **MM BR-2** and **MM BR-5**, project-related impacts to protected waters would be less than significant.

Significance: Less than Significant with Mitigation Incorporation

d. Would the 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?

Migrating and Nesting Birds

The proposed project area is within areas known to support substantial populations of migrating and nesting birds. The entire project area occurs within the Pacific Flyway, and the San Dieguito Lagoon and Los Peñasquitos Lagoon are combined part of the North San Diego Lagoons, a unified group of coastal lagoons that together are considered an Important Bird Area (National Audubon Society n.d.[b]). Project-related impacts to migrating birds or avian nesting populations could result from habitat degradation from construction-related erosion, siltation, or runoff of sediment or hazardous materials, removal of food sources such as vegetation with seed and/or nectar food sources and/or vegetation that supports food resources such as insects, disturbance resulting from loud noises or bright lights in habitat areas, and the potential for bird and nest strikes by construction equipment/vehicles including helicopters. These impacts could substantially interfere with avian movement and could additionally impact avian species known to nest within or near the project area, potentially leading to nest abandonment and/or failure. All of these impacts would be significant.

To minimize impacts to migrating and nesting avian species, the applicant shall adhere to **MM BR-1**, which would require daily preconstruction activity sweeps to determine the presence of biological resources including avian species within the project area. **MM BR-2** requires exclusionary fencing surrounding sensitive biological resources, including areas that support migrating avian species. **MM BR-6** would specifically minimize impact to avian species by prohibiting construction within San Dieguito Lagoon and Los Peñasquitos Lagoon during nesting bird season (February 1–August 31), establishing nest buffers to protect active nests, and to reduce the risk of avian strikes by project-related equipment or vehicles, including helicopters. Additionally, the applicant shall adhere to **MM BR-7**, which requires that all nighttime construction activities utilize downward-oriented night lighting directed to minimize spill into nearby habitat. Through the incorporation of **MM BR-2**, **MM BR-6**, and **MM BR-7**, impacts to migrating bird populations and nesting birds would be less than significant.

Western Monarch Butterfly Overwintering Populations

Populations of western monarch butterfly migrate to coastal California during the overwintering season (September to February). The western monarch butterfly was observed within the project area outside of overwintering season, and populations are known to migrate to multiple sites within 1 mile of the project area to roost and overwinter in eucalyptus and pine trees (see Table 5.4-8). In general, overwintering western monarch butterfly populations are not breeding populations, so project-related impacts to western monarch butterfly nursery sites are not anticipated. However, the removal of suitable western monarch butterfly overwintering habitat including roosting trees and nectar sources would substantially interfere with an established migration pattern, and would therefore be significant.

To minimize potential impacts to overwintering western monarch butterfly species, the applicant shall adhere to **MM BR-4** **MM BR-8**, which requires biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations. Additionally, **MM BR-5** would require restoration of host plant species, and prohibits the removal of host plant species and overwintering habitat within designated areas during western monarch butterfly overwintering season. Combined, these measures would reduce impacts to overwintering western monarch butterfly populations to less than significant.

Bat Maternity Roosts

The pocketed free-tailed bat has a high potential to occur within the project area. Bat maternity roosts could be subject to disturbance resulting from project-related activities, including noise and lighting disturbance, or disturbances associated with crews and activities near active roosting sites. These would be significant impacts to wildlife nursery sites.

To minimize potential impacts to bat maternity roosts, the applicant has proposed to incorporate **APM-BIO-09**, which would require the applicant to conduct a preconstruction habitat survey for potential bat roosts that may be impacted by project-related activities, and establishes a minimum 200-foot buffer between project construction and identified maternal bat roosts. Additionally, **MM BR-7** requires that all nighttime construction activities utilize downward-oriented night lighting directed to minimize spill into nearby habitat which could be disruptive and disorienting to foraging bat species. With the incorporation of **APM-BIO-09** and **MM BR-7**, impacts to bat maternity roosts would be less than significant.

Significance: Less than Significant with Mitigation Incorporation

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

The proposed project is not subject to local or regional regulations, policies, or ordinances because local regulation of utility projects is preempted by the CPUC. However, CEQA requires an analysis of potential conflicts with local regulations, and the applicant may implement measures and design features that maintain consistency with local authorities. The project area occurs within areas protected by local City of San Diego and City of Del Mar ordinances intended to protect biological resources. The local policies and ordinances are designed to protect resources specific to each area.

The City of San Diego Municipal Code

The City of San Diego defines environmentally sensitive lands as both wetland and upland areas that support sensitive biological resources, including all wetlands and upland areas described in the City of San Diego MSCP Preserve; lands outside the MHPA that contain Tier I, II, IIIA, or IIIB Habitats; and lands that support rare, threatened, endangered, narrow endemic, or otherwise covered species (City of San Diego 2018). Furthermore, ordinances §143.0140(d) and §143.0141(b)(5) from the code prohibit temporary disturbance or storage of material or equipment in environmentally sensitive lands except when approved in a Site Development Permit, or if demonstrated that activities will not cause permanent habitat loss, and require a minimum 100-foot buffer between project activities and wetlands in the Coastal Overlay Zone.

Portions of the proposed project would occur in Tier I, II, and/or III habitat areas, and in lands supporting rare, endangered, threatened, Narrow Endemic, and/or covered species. These areas would all be considered environmentally sensitive lands. Project-related construction activities could potentially disturb biological resources within the environmentally sensitive lands, which would conflict with ordinance §143.0140(d). Additionally, the proposed Torrey Pines Fly Yard is set back approximately 80 feet from coastal salt marsh wetland habitat, which conflicts with ordinance §143.0141(b)(5).

Torrey Hills Community Plan

As per the California Coastal Act, local permitting agencies with CCC-certified Local Coastal Programs (LCP) are authorized to issue Coastal Development Permits. The Planning Context chapter of the Torrey Hills Community Plan contains Local Coastal Program Policies, including a policy requiring 100-foot buffers between new development and wetlands, or less if it is determined through consultation with CDFW and USFWS that a smaller buffer will sufficiently protect the wetlands resources based on site-specific information (City of San Diego 2014b).

Because the proposed Torrey Pines Fly Yard is less than 100 feet from coastal salt marsh wetland habitat, project-related activities within the fly yard may conflict with this policy. However, the Community Facilities Element of the Torrey Hills Community Plan promotes the removal or relocation of public utility or facility projects from Los Peñasquitos Lagoon and the undergrounding of all above-ground utility lines when feasible.

MM BR-2 would require at least 50-foot-wide buffers between staging areas and wetland areas, and 100-foot buffers between project activities in the Torrey Pines Fly Yard and Los Peñasquitos Lagoon, unless a different buffer distance is determined to be appropriate by the CPUC-approved biologist. As a project under CPUC regulatory jurisdiction, CPUC authority over the project supersedes local regulatory measures. Therefore, through the incorporation of **MM BR-2**, which establishes buffer distances between wetlands and proposed project activities to a minimum of 50–100 feet while maintaining wetland protection through onsite determinations made by a qualified monitor, the proposed project would be consistent with the City of San Diego Municipal Code and with the Torrey Hills Community Plan and its Local Coastal Program.

Local Tree Ordinances

The City of San Diego Public Tree Protection Policy and the City of Del Mar Tree Policy Manual both contain restrictions regarding public tree trimming and removal. The proposed project would not involve the removal of any public trees, though trimming of some trees may be required. Policy A from the City of San Diego Public Tree Protection Policy allows community groups, citizens, council members, and city officials or staff to designate trees as protected. Policy 4A, described below, pertains to trees designated as part of a Preservation Grove, which would be considered biologically sensitive. Preservation Grove trees are groups of at least six naturally occurring native trees of similar species or form within a 0.25-acre area in public ROW, public or private open space, designated Environmentally Sensitive Lands or parkland, with trunks spaced closer than 100 feet apart. Project-related trimming of Preservation Grove-designated trees would conflict with the City of San Diego Public Tree Protection Policy (City of San Diego 2005).

Measures and policies from the City of San Diego Public Tree Protection Policy intended to protect designated trees require that CPUC projects take measures to avoid excessive pruning, topping or removals related to utility line clearance, and any such trimming requires collaboration with the City Arborist (who may approve a licensed arborist to conduct such activities) and the City's Urban Forester.

The Public Tree Policy Manual for the City of Del Mar pertains to tree protection policies during construction, and contains policies intended to minimize construction-related impacts to trees if avoidance is not feasible. The manual describes prohibited and permitted tree pruning methods, and prohibits construction or contractor personnel from pruning trees, instead requiring coordination with the City Arborist who may approve a qualified tree care specialist or certified tree worker for such activities. Additionally, the manual contains measures that minimize potential risks to protected trees and their roots during trenching and excavation activities, including notifying the approved arborist or tree care working at least 24 hours prior to conducting work in the Tree Protection Zone (see **MM BR-5**), and describes appropriate, tree-safe strategies in instances of root severance, excavations, and heavy equipment storage (City of Del Mar 2004).

If tree trimming or pruning are determined to be necessary during proposed project construction, these activities could potentially conflict with the policies described above. Additionally, if such activities are conducted without prior agency approval, or without a City Arborist present during qualified activities, the activities would conflict with the local tree protection policies. **MM BR-5** requires the development of a Tree Protection and Preservation Plan, which shall disclose and protected trees that may require trimming, which protected trees would potentially be subjected to construction activities within the dripline area along with strategies to route construction out of the dripline area when feasible, describe a Tree Protection Zone surrounding protected trees, and shall include the methods of communication between the applicant, the CPUC, and local qualified city arborists. With the incorporation of **MM BR-5**, the proposed project would be consistent with the City of San Diego Public Tree Protection Policy and with the City of Del Mar Tree Policy Manual.

Significance: Less than Significant with Mitigation Incorporation

f. 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?

Most of the project area occurs within areas protected under the City of San Diego MSCP Subarea Plan. Approximately 1.28 miles of ~~Powerline~~ TL674A, 6.24 miles of ~~Powerline~~ TL666D, 1.06 miles of ~~Powerline~~ C510, and 0.1 miles of ~~Powerline~~ C738 are fall within the designation. Portions of the project area within Los Peñasquitos Lagoon and the Torrey Pines State Natural Reserve Extension are located within the City of San Diego Subarea Plan of the MSCP.

Certain project-related activities may conflict with Land Use Considerations, General Planning Policies and Design Guidelines, and Land Use Adjacency Guidelines as described in the MSCP. The MSCP requires mitigation when disturbance of wetlands or MSCP-covered species cannot be avoided, including disturbance associated with temporary access roads and staging areas, and prohibits the introduction of invasive, non-native plant species within or adjacent to MHPA lands. The MSCP prohibits construction activities that would substantially disrupt habitat including wildlife corridors, such as equipment storage, littering, lighting spillover, and noise disturbance. Additionally, MSCP Guideline C18, specific to the Future Urbanizing Area, recommends a 200-foot-wide buffer between development and wetlands, though this buffer width is not a requirement for consistency with the plan (City of San Diego 1997).

MSCP-preserved habitat, including wildlife corridors, that would be disturbed by any means during project construction, such as by light intrusion, elevated noise levels, littering, equipment storage, vegetation removal, or ground disturbance would conflict with the City of San Diego Subarea Plan of the County of San Diego MSCP. Additionally, buffers less than 200 feet in width between wetlands and development would conflict with the MSCP-recommended wetland buffer width for the Future Urbanizing Area, though a 200-foot buffer width is not a requirement.

To maintain consistency with the MSCP and MHPA, and SDG&E shall adhere to the Operational Protocols described in Chapter 7.1 in their own NCCP, which include (but are not limited to) the following:

***Protocol 8.** Littering is not allowed. SDG&E shall not deposit or leave any food or waste on the rights-of-way or adjacent property.*

***Protocol 11.** All SDG&E personnel working within the project area shall participate in an employee training program conducted by SDG&E, with annual updates. The program will consist of a brief discussion of endangered species biology and the legal protections afforded to Covered Species; a discussion of the biology of the Covered Species protected under this Subregional Plan; the habitat requirements of these Covered Species; their status under the Endangered Species Acts; measures being taken for the protection of Covered Species and their habitats under this Subregional Plan; and a review of the Operational Protocols. A fact sheet conveying this information will also be distributed to all employees working in the project area.*

Additionally, to maintain further consistency with the City of San Diego MSCP, the applicant shall adhere to **MM BR-2**, which would ensure that all Environmentally Sensitive Areas, including ESHAs, are demarcated to prevent impacts such as trampling, runoff, sedimentation, and habitat degradation or destruction associated with proposed project activities. **MM BR-2** further establishes buffers no less than

50 feet between staging areas and wetland areas, or no less than 100 feet from the Los Peñasquitos Lagoon for the Torrey Pines Fly Yard. The applicant shall also adhere to **MM BR-3**, which, along with Operational Protocol 11, would require the development of a WEAP to ensure that crews are aware of sensitive biological resources that may be encountered onsite, and **MM BR-7**, which prohibits project-related nighttime lighting from spilling into adjacent habitat. Through the incorporation of **MM NOI-3**, the applicant would reduce construction-related noise levels that could disturb wildlife and would conflict with the City of San Diego MSCP Subarea Plan. Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures and Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP. Should there be any conflict between these guidelines, SDG&E's NCCP would supersede the direction of the other referenced documents.

Significance: Less than Significant with Mitigation Incorporation

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5.5 Cultural Resources

This section addresses historical resources, archeological resources, and paleontological resources in the project area vicinity, as defined below.

Technical Terminology

- **Historical Resources:** As defined by the California Environmental Quality Act (CEQA), historical resources are those that are listed on, or determined eligible for listing on, the California Register of Historical Resources (CRHR) or a local register, or are otherwise determined to be historical pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] section 21084.1 and California Code of Regulations, Title 14, Section 15064.5, respectively). A historical resource, for example, may be an object, building, structure, site, area, place, record, or manuscript that is historically significant or significant in terms of California's architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Historical resources are at least 50 years old and must retain sufficient "integrity" to convey historic significance.
- **Archaeological Resources:** Archaeological resources may be considered historical resources, or, if not, they may be determined to be "unique" as defined by CEQA (PRC Section 21083.2). Unique archaeological resources are artifacts, objects, or sites that can be demonstrated to: (1) contain information needed to answer important scientific research questions and for which it can be shown that there is a demonstrable public interest in that information; (2) have a special and particular quality such as being the oldest of their type or the best available example of their type; or (3) be directly associated with a scientifically recognized important prehistoric or historic event or person. Non-unique archaeological resources that do not fall under the above categories are typically considered outside of the scope of environmental review.
- **Paleontological Resources:** For the purposes of this Initial Study, paleontological resources refer to fossilized plant and animal remains of prehistoric species that are valued for the information they may yield about the history of the earth and its past ecological settings. Paleontological resources represent limited, non-renewable, and impact-sensitive scientific and educational resources, which may include fossil remains such as bones, teeth, shells, and leaves found in geologic deposits (rock formations), as well as the collecting localities and the geologic formations that contain those fossils.

5.5.1 Environmental Setting

Background

The applicant provided a Cultural Resources Technical Report (CTR) (Foglia, Cooley, and Mello 2017; Appendix D), as well as a Paleontological Technical Study (Richards and Raum 2017; Appendix I) that serve as primary sources for the evaluation of potential impacts to cultural resources. These reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coastal Information Center at San Diego State University. An additional records search was conducted for the project components located on State Parks–owned land within the Torrey Pines State Natural Reserve.

The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands ~~Record~~ File Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC's response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix H for additional information.

Information on the geologic setting and potential presence of paleontological resources was derived from published and unpublished geologic and paleontological reports. A paleontological records search was conducted using San Diego Natural History Museum databases to identify fossil finds within a 1-mile radius of proposed project components. Paleo Solutions, Inc. conducted field investigations in October and November 2016 that focused primarily on previously undisturbed areas and prominent outcrops of native sedimentary units with high paleontological sensitivity within the project area and included the inspection of sediment and bedrock outcrops, documentation of rock exposures and surrounding areas, collection of reference points using a global positioning system unit, and analysis of sediment and bedrock lithologies. See Appendix ~~H~~ I for additional information.

Prehistoric to Historic Period Overview

As shown in Appendix D, the proposed project would be located along the central San Diego coast within California's Southern Coast Archaeological Region. In this area, approximately 10,000 years of documented prehistory of the San Diego region are represented as the Early Prehistoric (San Dieguito tradition/complex), the Archaic (Milling Stone Horizon, Encinitas tradition, and La Jolla and Pauma complexes), and the Late Prehistoric (Cuyamaca and San Luis Rey complexes) periods (Foglia, Cooley, and Mello 2017).

Early Prehistoric

The Early Prehistoric period, also referred to as the Paleo-Indian period, represents the time of the first known inhabitants in California. It is defined by big game hunting activities occurring during the Terminal Pleistocene (pre-10,000 years ago) and the Early Holocene (10,000 years ago). Cultural assemblages associated with this period in the western U.S. include large fluted spear and Fluted-Point Tradition projectile points (Foglia, Cooley, and Mello 2017).

Sites in the San Diego area from this period belong to the San Dieguito Tradition, which dates back to 9,000 years ago. The San Dieguito Tradition has been documented primarily in the coastal area in San Diego County, as well as in the southeastern California deserts. This tradition is characterized by an artifact assemblage consisting almost entirely of flaked stone biface and scraping tools; it lacks the fluted points associated with the Fluted-Point Tradition. Diagnostic artifact types and categories associated with the San Dieguito Tradition include elongated bifacial knives; scraping tools; crescentics; and Silver Lake, Lake Mojave, and leaf-shaped projectile points (Foglia, Cooley, and Mello 2017).

Archaic

Foglia, Cooley, and Mello (2017) note that the Archaic period dates from approximately 8,600 before present (BP) to 1,300 BP. In California, sites from this period are located along the coast and inland. Assemblages associated with this period are designated as the La Jolla/Pauma complexes, which generally include manos and metates; shell middens; terrestrial and marine mammal remains; burials; rock features; bone tools; doughnut stones; discoidals; stone balls; plummets; biface points/knives; and

beads made of stone, bone, or shell. Coastal sites from this period typically include cobble-based tools, while inland sites typically include hunting equipment and quarry-based tools (Foglia, Cooley, and Mello 2017).

Archaic sites are more abundant along the coast of California than inland, and several are present in the project area vicinity. While inland archaeological sites containing Archaic period assemblages may be found in parts of central San Diego County, most of the archaeological evidence found to date is derived from sites in near-coastal valleys, estuaries, and/or embayments along the San Diego coast south of the San Luis Rey River. The proposed project would be located in an area where Archaic period sites are considered to have a high potential for containing La Jolla/Pauma complex artifact assemblages (Foglia, Cooley, and Mello 2017).

Several sites dating to the Archaic period are located within or near the proposed project alignment. As shown in Appendix D, four sites recorded within the project area have been identified as Archaic using radiocarbon and/or relative dating methods. Investigations at the San Dieguito Lagoon (CA-SDI-10,238) have produced radiocarbon dates from a shell midden deposit, spanning the middle to early Archaic period from approximately 5790 to 7690 BP. Within the Pensacitos Lagoon, the site CA-SDI-4513/4609/5443 is present; this site is the recorded location for the ethnohistoric village of Ystagua (Foglia, Cooley, and Mello 2017).

Late Prehistoric

Evidence of several new tool technologies and subsistence shifts in the archaeological record mark the start of the Late Prehistoric period. These changes occurred in what is now San Diego County around approximately 1,500 to 1,300 BP. Through the presence of known sites and archaeological materials, researchers have observed shifts in settlement patterning, a reduction in shellfish gathering, an increase in the storage of food and the production of pottery, the use of the bow and arrow for hunting, and the cremation of the dead (Foglia, Cooley, and Mello 2017).

As noted in Appendix D, research has noted that two complexes, the Cuyamaca and San Luis Rey, were present in the Late Prehistoric period in what is now San Diego County. According to True (1970, as cited in Foglia, Cooley, and Mello 2017), Cuyamaca complex sites generally contain both Cottonwood Triangular-style points and Desert Side-notched arrow points, while Desert Side-notched points are rare or absent in San Luis Rey complex sites. Other examples include ceramics and Obsidian Butte obsidian, the latter of which is far more common in Cuyamaca complex sites than in San Luis Rey complex sites. In addition, ceramics are more common in the southern or Cuyamaca complex portions of San Diego County. (Foglia, Cooley, and Mello 2017)

Both of these complexes have produced a variety of vessel types (e.g., rattles, straight and bow-shaped pipes, and effigies). According to studies cited in Appendix D, the interment of the dead at Cuyamaca complex sites was almost exclusively performed by cremation and often in special burial urns, while evidence from San Luis Rey complex sites indicates both inhumation and cremation. The Cuyamaca complex generally is believed to be associated with the Yuman Diegueño/Kumeyaay people, while the San Luis Rey complex is associated with the Shoshonean Luiseño/Juaneño people (Foglia, Cooley, and Mello 2017).

The proposed project would be located in an area that may contain Cuyamaca complex assemblages. A Late Prehistoric site (CA-SDI-4513/4609/5443) of this nature—the village of Ystagua—is near the proposed project area. This archaeological site consists of a Cuyamaca complex artifact assemblage; radiocarbon dates taken at the site range from approximately 5,040 to 220 BP. In addition to the site of Ystagua, another site near the proposed project (CA-SDI-4625), has been noted to contain both Desert Side-notched and Cottonwood Triangular points from the Late Prehistoric period (Foglia, Cooley, and Mello 2017).

Historic Period – American Period

Historic Period (1542 to 1769)

According to scholars, the Historic period in coastal Southern California began in September 1542, when Juan Rodriguez Cabrillo reached San Diego Bay as part of his “New Spain” expedition that signaled change in California, including new contact with indigenous populations, colonialism, and cultural shifts (Foglia, Cooley, and Mello 2017).

Spanish Period (1769 to 1821)

Nearly two hundred years after this initial expedition, the Spanish period (1769 to 1821) in California began. In 1769, Gaspar de Portola’s expedition was the driving force of Spanish imperial expansion into Alta California. The mission was intended to seek suitable locations to establish military presidios (fortifications) and religious missions. Between 1769 and 1821, the Spanish built the San Diego presidio and the San Diego, San Luis Rey, and San Juan Capistrano missions. Each is a symbol of Spanish colonialism that established new systems of labor, demographics, settlement, and economies (Foglia, Cooley, and Mello 2017).

Mexican Period (1821 to 1848)

The Mexican period (1821 to 1848) followed. During this time, many of the Spanish institutions and laws were retained. However, in 1835, the missions were secularized, and their large landholdings were made available to private citizens. This not only allowed for an increase in Mexican settlement, but it also meant that many Native Americans were dispossessed of their land and homes. After secularization, large tracts of land were granted to individuals and families, and a rancho system was established. Ranchos within the vicinity of the proposed project include Rancho San Dieguito, Rancho Los Peñasquitos, and the Pueblo Lands of San Diego (Foglia, Cooley, and Mello 2017).

Land during this time was used primarily for grazing cattle, which then dominated the agricultural activities, thereby allowing for the tallow and hide trades within the U.S. to increase. Transportation routes also increased as a result. The Mexican period ended when Mexico ceded California to the U.S. after the Mexican-American War (1846 to 1848).

American Period (1848 to present)

The period following the Mexican period is known as the American period (1848 to present), which began with Mexico signing the Treaty of Guadalupe Hidalgo, ceding California to the U.S. This brought an influx of settlers to California who were driven by the prospect of gold (i.e., the Gold Rush), the end of

1 the Civil War, and the passage of the Homestead Act, which promoted the U.S. ideal of manifest destiny
2 (Foglia, Cooley, and Mello 2017).

3
4 During this time, the railways were an important means of connecting California to the rest of the
5 country. While new rail connections forged connections between some groups of people, American
6 Indians were forced onto reservations. Reservations typically comprised the poorest of subsistence lands,
7 often forcing American Indians into a sedentary lifestyle (Foglia, Cooley, and Mello 2017).

8
9 By the 1880s, thousands of people had settled in the San Diego region, evidenced by ranches and sparse
10 settlements dotting the landscape. Within a couple of generations, much of the population moved away
11 from a rural lifestyle to a more urban one that better accommodated wartime needs brought about by
12 World War I. Aspects of wartime development included the creation of transportation networks based on
13 port facilities, railroads, highways, and airports; more elaborate systems of water supply and flood
14 control; grazing livestock and growing a changing array of crops; supporting military facilities; limited
15 amounts of manufacturing; and accommodating visitors and retirees. This pattern of urbanization and
16 infrastructure development continued through World War II (Foglia, Cooley, and Mello 2017).

17
18 Beginning in the early 1950s, residential development on the coast of California increased as a result of
19 the advances in transportation infrastructure, including the development of the Interstate 5 corridor, which
20 connected the coastal region to other urban centers along the California coastline (Foglia, Cooley, and
21 Mello 2017).

22 Urban Histories

23 Del Mar

24
25 The first inhabitants of what was to become the community of Del Mar date back to 1882, when
26 Theodore M. Loop purchased land and built a home on the north side of Los Peñasquitos Lagoon. He and
27 his wife constructed tents on the bench in the area now known as Torrey Pines State Reserve. Del Mar
28 was named by Loop's wife, Ella, who took it from a popular poem of the time titled "The Fight for Paso
29 Del Mar." Later that year, Jacob Taylor, a resident of Rancho Peñasquitos, saw the potential for a seaside
30 resort. Taylor and Loop purchased a total of 338.11 acres from homesteader Enoch Talbert for \$1,000,
31 with the vision of transforming the new town into an attraction for the rich and famous (Foglia, Cooley,
32 and Mello 2017).

33
34 The focal point of the new town was Casa del Mar, a hotel. Other attractions included a train station,
35 dance pavilion, and bathing pool. A general store opened on 9th Street in 1884. Casa del Mar, however,
36 was destroyed by a fire in 1889. Further development of Del Mar did not occur for the remainder of the
37 century (Del Mar Historical Society n.d., as cited in Foglia, Cooley, and Mello 2017).

38
39 Throughout the early 20th century, development amenable to the upper class continued. While the
40 Depression of the 1930s slowed growth in Del Mar, the selection of the San Dieguito Valley as the site of
41 the San Diego County Fair was a catalyst in bringing activity to the seaside community. The first San
42 Diego County Fair opened on October 8, 1936; it was attended by 50,000 people. In 1937, the Del Mar
43 Turf Club was opened next to the fairgrounds for horse racing (Foglia, Cooley, and Mello 2017).

The racetrack was closed to the public during World War II, with the club and surrounding fairgrounds in use by the U.S. military. By 1943, troops had left the racetrack and the area was used to manufacture B-17 “Flying Fortress” bomber parts until 1944. After World War II, the San Diego County Fair reopened to the public and new marketing campaigns sought to attract people to Del Mar (Foglia, Cooley, and Mello 2017).

Del Mar officially became a city in 1959. Shortly thereafter in 1960, the University of California, San Diego opened in nearby La Jolla. Over the years, ecological preservation was an important principle guiding growth and development in the city, and more open space preserves and areas in the city were delineated. Further development, such as boutiques and luxury hotels, occurred. Today, Del Mar retains its historical center where Taylor first laid the town (Foglia, Cooley, and Mello 2017).

San Diego

The City of San Diego was founded in 1769, when a camp was established on Presidio Hill near the present site of Old Town; however, it was over 80 years until San Diego became a chartered city in 1850. At the time, the city’s population consisted of approximately 650 persons. San Diego’s first elected mayor was Joshua Bean (City of San Diego 2018).

Alonzo Erastus Horton arrived in San Diego in 1867 from San Francisco. He purchased approximately 800 acres of land, which eventually became New San Diego, today’s downtown area. City growth was stimulated by landowners, such as Horton, and fueled by the potential for wealth in the growing San Diego region that had land and natural resources (City of San Diego 2018).

By 1870, the city’s population exceeded 2,000 residents, and the gold rush, land speculation, and improvements in transportation foretold a population boom in the coming 1880s. This boom, however, quickly crashed but drew many homesteaders to the area, who were the first to develop the city’s periphery. The move from Old San Diego to the area within Horton’s subdivision also created the need for municipal services. By 1886, for instance, electrical service began in the city of San Diego; this supplemented several of the 1870s gas distribution systems (Foglia, Cooley, and Mello 2017).

By the year 1900, the city’s population exceeded 17,000 inhabitants. The population then doubled to approximately 39,578 in the next 10 years. By the early 1920s, San Diego’s population had increased to over 74,000 people, fueled in part in response to the presence of U.S. military in the city, as the U.S. Navy made San Diego the base for its Pacific Fleet just after World War I (City of San Diego 2018).

By the mid-20th century, the city of San Diego had a population of over 330,000, ensuring its place as one of California’s major urban areas. In 1970, San Diego became the second largest city in the state, with a population of over 696,474 people (City of San Diego 2018).

5.5.2 Records Searches and Survey Results

Cultural Resources Record Search and Survey Results

The applicant conducted a record search of past surveys and previously identified cultural resources in September 2016 at the South Coastal Information Center (Appendix D). The records search included the four project components and a 0.5-mile surrounding radius (Foglia, Cooley, and Mello 2017). Since a

portion of the proposed project also would extend into the Torrey Pines State Natural Reserve Extension Area, a San Diego Coast District Archaeologist performed an additional records search of California Department of Parks' records in October 2016 (Foglia, Cooley, and Mello 2017). Cultural resources surveys were conducted by the applicant for the proposed project in September and October of 2016. Native American monitors were present for the surveys that were conducted on State Park lands (under permit #16-30).

The records search identified 301 previous cultural resource studies that were conducted within 0.5 miles; of these, 116 studies accounted for a survey/study area that is entirely or partially within the proposed project components' footprint and buffer study area. The records search also identified 191 cultural resources within either the footprint of the proposed project component and/or its 0.5-mile buffer radius. These resources include 124 prehistoric archaeological sites and 41 prehistoric isolates; nine multi-component (prehistoric and historic) archaeological sites; 14 historic sites, structures, or buildings; two historic isolates; and one with an indefinite association¹ (Foglia, Cooley, and Mello 2017).

Archaeological Survey Results

An archaeological survey was conducted for an area generally matching the project's utility corridors in addition to a ~~300~~ 150-foot buffer (300-foot corridor) around the linear alignments as well as a 100-foot buffer around non-contiguous temporary work areas (Appendix D). The survey area extended approximately 8 miles along the length of the utility corridors. The buffer areas noted above are included with the 8-mile survey area of the four project components to yield a total survey-study area footprint. The survey-study area is then used for two primary purposes: (1) to identify known or potentially eligible resources within or immediately adjacent the survey-study area; (2) to determine the level of potential impact to potential resources, by assuming potential resources within the survey-study area could be at risk of material damage, a significant impact associated with construction or ground-disturbing activities. The survey-study area's footprint is roughly 319 acres. Private residences and yards, commercial areas, paved areas, developed areas, and waterlogged areas were excluded from the calculations of this area (Foglia, Cooley, and Mello 2017).

The archaeological survey yielded the following information: identification of 22 archaeological sites and 12 isolated finds, which include 19 previously recorded sites and five isolated finds, as well as three newly identified sites and seven isolated finds.

As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CA-SDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the ~~three~~ four sites overlapping the project's potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant's subcontractor deemed other areas too unsafe to test.

¹ Per Foglia, Cooley, and Mello (2017), the resource noted as having an indefinite temporal association (i.e., no clear association with the prehistoric or historic periods) is a rock cairn. No site number is associated with the description of this resource when discussed in reference to the total number of resources within the CTR study area. The only other reference to a cairn within the CTR is Site Number P-37-029577. This site, however, is shown as having a prehistoric association.

Table 5.5-1 Archaeological Sites and Isolated Finds

Site Number (Primary Number/Trinomial)	Type	Period	Site Description	Land Ownership	CRHR Eligibility Status ^(a)	Within Area of Direct Impact ^(b)
Previously Recorded Sites						
CA-SDI-191/ P-37-000191	Site	Prehistoric	Habitation Site	Private; SDG&E	May be eligible	Yes
CA-SDI-192/ P-37-000192	Site	Prehistoric	Unknown	Private; SDRP	Not evaluated	No
CA-SDI-193/ P-37-000193	Site	Prehistoric	Shell scatter	CDFW	May be eligible	Yes
CA-SDI-197/ P-37-000197	Site	Prehistoric	Habitation site	Private	Not eligible	Yes
CA-SDI-531/ P-37-000531	Site	Prehistoric	Lithic scatter	Private; Caltrans	Not evaluated	No
CA-SDI-686/ P-37-000531	Site	Prehistoric	Habitation site	Private	May be eligible	Yes
CA-SDI-5957/ P-37-005957	Site	Prehistoric	Habitation site	Private; SDRP	Not evaluated	No
CA-SDI-7289/ P-37-007289	Site	Prehistoric	Habitation site	SDRP	Not evaluated	No
CA-SDI-10143/ P-37-010143	Site	Prehistoric	Lithic, shell scatter	Caltrans	Not evaluated	No
CA-SDI-12121/ P-37-012121	Site	Prehistoric	Lithic, shell scatter	Private; Caltrans	Not evaluated	No
CA-SDI-12122/ P-37-012122	Site	Prehistoric	Lithic, shell scatter	Private; Caltrans	Not evaluated	No
CA-SDI-14456/ P-37-015861	Site	Historic	Cistern	State Parks	Not evaluated	No
CA-SDI-14457/ P-37-015862	Site	Multicomponent	Debris, shell scatter	State Parks	Not evaluated	No
CA-SDI-14458/ P-37-015863	Site	Historic	Debris scatter, cisterns	State Parks	Not evaluated	No
CA-SDI-14460/ P-37-015867	Site	Prehistoric	Habitation site	State Parks	Not evaluated	No
CA-SDI-16237/ P-37-024485	Site	Prehistoric	Habitation site	State Parks	Not evaluated	No
CA-SDI-16653/ P-37-017122	Site	Prehistoric	Habitation site	Private; State Parks	May be eligible	Yes
CA-SDI-17388/ P-37-026492	Site	Prehistoric	Habitation site	State Parks	Not evaluated	No
CA-SDI-20839/ P-37-033095	Site	Multicomponent	Lithic, debris scatter	State Parks	Not evaluated	No
Previously Recorded Isolates						
P-37-016571	Isolate	Prehistoric	Shell	SDRP	Not eligible	Yes
P-37-016572	Isolate	Prehistoric	Shell	SDRP	Not eligible	No
P-37-033076	Isolate	Prehistoric	Lithic scatter	State Parks	Not eligible	No
P-37-033077	Isolate	Prehistoric	Lithic scatter	State Parks	Not eligible	No
P-37-034567	Isolate	Prehistoric	Chopper	Private	Not eligible	Yes

Table 5.5-1 Archaeological Sites and Isolated Finds

Site Number (Primary Number/Trinomial)	Type	Period	Site Description	Land Ownership	CRHR Eligibility Status ^(a)	Within Area of Direct Impact ^(b)
Newly Identified Sites						
CA-SDI-22046/ P-37-036416	Site	Prehistoric	Prehistoric bedrock milling	Private	Not evaluated	No
CA-SDI-22047/ P-37-036417	Site	Prehistoric	Lithic and shell scatter	Private	Not evaluated	No
CA-SDI-22048/ P-37-036420	Site	Historic	Trash dump	CDFW	Not evaluated	No
Newly Identified Isolates						
P-37-036421	Isolate	Historic	Insulator	Private	Not eligible	No
P-37-036424	Isolate	Prehistoric	Flake	Private	Not eligible	No
P-37-036425	Isolate	Prehistoric	Ceramic sherd	SDRP	Not eligible	No
P-37-036426	Isolate	Prehistoric	Shell	SDRP	Not eligible	No
P-37-036427	Isolate	Prehistoric	Flake	State Parks	Not eligible	No
P-37-036428	Isolate	Prehistoric	Flake	State Parks	Not eligible	No
P-37-036429	Isolate	Prehistoric	Lithic Scatter	State Parks	Not eligible	No

Source: Foglia, Cooley, and Mello 2017

Notes:

- (a) "Not evaluated" refers to sites that are not within the area of direct impact and were not evaluated by the applicant because they would not be impacted and could be avoided by construction.
- (b) The area of direct impact is included within the proposed project area; it accounts for areas that would be directly utilized by construction and could contain work locations, staging yards, drop zones, etc. Resources within the area of direct impact have the potential to be substantially damaged by ground disturbance or soils disturbance.

Key:

CDFW = California Department of Fish and Wildlife

CRHR = California Register of Historic Places

SDG&E = San Diego Gas & Electric Company

SDRP = San Dieguito River Park

State Parks = California State Department of Parks and Recreation

Portions of the proposed project would also be located within the boundaries of CA-SDI-197 (shell scatter), P-37-016571 (isolate shell), and P-37-034567 (isolate chopper). CA-SDI-197 has been destroyed by the construction of two large office buildings; the site was deemed ineligible for the CRHR due to the magnitude of prior disturbance; P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, though as isolates may have limited research potential (Foglia, Cooley, and Mello 2017). Sites noted as "not evaluated" are not located in the project area and were therefore not evaluated for listing on the CRHR since they would not be directly or indirectly affected by the proposed project (Foglia, Cooley, and Mello 2017).

Architectural Survey Results

An architectural survey also was conducted by the applicant in October 2016 to determine the presence of historic buildings and structures aged 45 years and older (Foglia, Cooley, and Mello 2017). This reconnaissance-level survey covered the same area as the archaeological survey. As shown in Table 5.5-2, the architectural survey identifies 11 historic period resources, three of which were previously recorded.

Table 5.5-2 Historic Architectural Resources

Site Number	Site Type	Period	Site Description	Land Ownership	CRHR Eligibility Status	Within Area of Direct Impact ^(a)
Previously Recorded Resources						
P-37-035936	Site	Historic	Del Mar Racetrack and Outer Buildings	Private	Eligible	No
P-37-014052	Site	Historic	El Camino Real	San Diego County	Eligible	No
P-37-036430	District	Historic	Sorrento Valley Industrial Park	Caltrans	Eligible	Yes
Newly Evaluated Sites						
P-37-036418	Structure	Historic	Del Mar Substation	SDG&E	Not eligible	Yes
P-37-036412	Single-Family Residence	Historic	1601 San Dieguito Drive	Private	Not eligible	No
P-37-036413	Single-Family Residence	Historic	1604 San Dieguito Drive	Private	Not eligible	No
P-37-036414	Building	Historic	Commercial	Private	Not eligible	No
P-37-036415	Structure	Historic	Tie Line 666D	SDG&E	Not eligible	Yes
P-37-036422	Building	Historic	Corrugated metal warehouse	Private	Not eligible	Yes
P-37-036423	Structure	Historic	Old Grand Avenue Bridge	SDRP	Not eligible	Yes
P-37-036419	Site	Historic	California Southern Railroad Surfline	State Parks; Private	Not eligible	Yes

Source: Foglia, Cooley, and Mello 2017

Note:

^(a) The area of direct impact is included within the project area; it accounts for areas that would be directly utilized by construction and could contain work locations, staging yards, drop zones, etc. Resources within the area of direct impact could be affected by ground disturbance or surface disturbance. For the purposes of this evaluation, the resource itself and the parcel(s) in which it is located are considered.

Key:

CRHR = California Register of Historic Places

SDG&E = San Diego Gas & Electric Company

SDRP = San Dieguito River Park

State Parks = California State Department of Parks and Recreation

Among the aboveground historic sites and resources, three resources are noted as eligible for the CRHR: the Del Mar Racetrack and Outbuildings, El Camino Real, and the Sorrento Valley Industrial Park. Each of these three resources would be located adjacent to proposed project components. Two of them, P-37-035936 (Del Mar Racetrack) P-37-036430 (Sorrento Valley Industrial Park Building) had already been evaluated and found eligible for inclusion in the CRHR before the study conducted by the applicant (Foglia, Cooley, and Mello 2017). Within the Del Mar Racetrack and Outbuilding property, only the Human Resources Building is located within the project area.² This building in particular does not appear to be eligible for the CRHR as an individual listing or as a contributing building to the overall property. The segments of El Camino Real and Old El Camino Real within the proposed project area consist of raised, paved county roads; these portions are eligible for the CRHR. One of the buildings within the Sorrento Valley Industrial Park was evaluated in 2006 as part of this study and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP (Foglia, Cooley, and Mello 2017).

² The Del Mar Human Resources building is not located within the area of direct impact.

As shown in Table 5.5-2, portions of the proposed project design components would be located within P-37-036430 (Sorrento Valley Industrial District), P-37-036418 (Del Mar Substation), P-37-036415 (Tie Line 666D), P-37-036422 (Corrugated metal warehouse), P-37-036423 (Old Grand Avenue Bridge), and P-37-036419 (Old Pacific Surf Liner Railroad).

5.5.3 Paleontological Resources

Records Search

Information on the geologic setting and potential presence of paleontological resources was derived from published and unpublished geologic and paleontological reports. A paleontological records search was conducted by the applicant using San Diego Natural History Museum databases to identify fossil finds within a 1-mile radius of the proposed project (Appendix I). According to the records search, 215 fossil localities have been recorded within a 1-mile radius of the project's utility corridors (Richards and Raum 2017).

The following mapped geologic formations with a high paleontological potential are located within the proposed project area: old paralic deposits (Late to Middle Pleistocene); very old paralic deposits (Middle to Early Pleistocene); very old paralic deposits (Middle to Early Pleistocene); Ardath Shale (Middle Eocene); Delmar Formation (Middle Eocene); Torrey Sandstone (Middle Eocene); Scripps Formation (Middle Eocene); Undivided Eocene rocks (Eocene) (Richards and Raum 2017).

Field Survey Results

Paleo Solutions, Inc. conducted a paleontological field investigation in October and November of 2016 (Appendix I). A state park paleontological investigations/collections permit was obtained to survey project components within the Torrey Pines State Natural Reserve (Richards and Raum 2017). Paleo Solution's methodology consisted of surveying thorough transects of the alignment of the project components, which extends linearly approximately 8 miles. The investigation focused primarily on previously undisturbed areas and prominent outcrops of native sedimentary units with high paleontological sensitivity. In these high-sensitivity areas, the survey area consisted of the alignment and a 100-meter buffer (i.e., 50 meters on either side of the alignment). Low-sensitivity geologic units were confirmed as mapped, but not intensively surveyed. Field activities generally included the inspection of sediment and bedrock outcrops, documentation of rock exposures and surrounding areas, collection of reference points, and analysis of sediment and bedrock lithologies.

Four non-significant fossil localities were recorded during the survey; three of these were located within the survey alignment, and the fourth just outside of it. All localities consisted of invertebrate shell fossils, which exhibited poor to good preservation. All fossils documented during the survey were discovered within sediments mapped as Delmar Formation. The authors of the survey report, however, noted that other sediments would be conducive to fossil preservation (Richards and Raum 2017).

5.5.4 Regulatory Setting

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966, as amended (NHPA) (54 United States Code [U.S.C.] 300101 et seq.), is the primary federal law governing the consideration of historic properties by federal agencies in the U.S. This act established a program for the preservation of historic properties and created the National Register of Historic Places (NRHP), State Historic Preservation Offices (SHPOs), Section 106 Review Process, and Section 110 programs for identification, evaluation, and protection of historic properties.

National Register of Historic Places

The NRHP is the nation's official list of buildings, structures, objects, sites, and districts due to their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria.

To be eligible for listing in the NRHP, a resource must meet at least one of the following criteria:

- A. Is associated with events that have made a significant contribution to the broad patterns of our history;
- B. Is associated with the lives of persons significant in our past;
- C. Embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and /or
- D. Has yielded, or may be likely to yield, information important in history or prehistory.

Historic properties that are listed within the NRHP in California also are included within the CRHR.

The Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act (123 Statute 1172; 16 U.S.C. 470aaa) directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. This act applies to federal lands.

State

California Environmental Quality Act

CEQA's provisions directing the analysis of historical resources are provided in PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a)-(b). Per CEQA Guidelines Section 15064.5(a), the term "historical resource" is defined as follows:

1. A resource listed in the CRHR, or determined by the State Historical Resources Commission to be eligible for listing in the CRHR.
2. A resource included in a local register of historical resources or identified as significant in a historical resource survey will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or that is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be "historically significant" if the resource meets the following criteria for listing in the CRHR:
 - a. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
 - b. It is associated with the lives of persons who are important to California's past.
 - c. It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
 - d. It has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in the CRHR, is determined to be ineligible for listing in the CRHR, is not included in a local register of historical resources, or is identified in a historical resources survey does not preclude a lead agency from determining that the resource may be a historical resource.

California PRC Section 21083.2(g) defines a "unique archaeological resource" as: an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- a. It contains information needed to answer important scientific research questions, and there is a demonstrable public interest in that information.
- b. It has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- c. It is directly associated with a scientifically recognized, important prehistoric or historical event or person.

Section 15064.5(b)(1) of the CEQA Guidelines explains what constitutes a substantial adverse change in the significance of an historical resource. Such a change may involve physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, such that the significance of the resource would be materially impaired.

In order to be deemed significant, an object must retain sufficient integrity, meaning the resource retains its physical characteristics that convey its historical significance (CEQA Guidelines Section 15064.5 (b)). Determination of whether an object retains “integrity” is based on the following factors: location, design, setting, materials, workmanship, feeling, and association (similar to the definition of integrity for the NRHP). In addition, CEQA applies to effects on archaeological sites, if a site is determined by the lead agency to be an historical resource, and if the resource meets the definition of a unique archaeological resource.

Paleontological resources are afforded protection under CEQA Appendix G (Section 15023). CEQA requires that impacts to paleontological resources be assessed and mitigated on all public and/or private discretionary projects. The CEQA lead agency having jurisdiction over a proposed project would be responsible for ensuring that paleontological resources are protected in compliance with CEQA and other applicable statutes.

Other Applicable Public Resources Code Sections

In addition to CEQA, the following PRC sections regulate and govern the treatment of cultural and paleontological resources in California:

- PRC Section 30244 requires the reasonable mitigation of adverse impacts to paleontological resources from development on public land.
- PRC Sections 4307-4309 affords protection to geologic features and “paleontological materials,” but grants the director of the state park system authority to issue permits for specific activities that may result in damage to such resources, if the activities are for state park purposes and are in the interest of the state park system.
- PRC 5097.5 states that a person shall “not knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.” Public lands refers to land “owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.”
- PRC Sections 5097.91 through 5097.991 establish and authorize the NAHC. Among these sections, the PRC prohibits the acquisition or possession of Native American artifacts or human remains taken from a Native American grave or cairn, except in accordance with an agreement reached with the NAHC. They also provide for Native American remains and associated grave artifacts to be repatriated.

- Subsections 5097.98(b) and (e) require a landowner on whose property Native American human remains are found to limit further development activity in the vicinity until conferring with the most likely descendants (MLDs) (as identified by the NAHC) to consider treatment options.
- PRC Sections 5097.993 through 5097.994 make it a misdemeanor crime to perform the unlawful and malicious excavation, removal, or destruction of Native American archaeological or historical sites on public or private lands.
- PRC Section 6254(r) protects Native American graves, cemeteries, and sacred places maintained by the NAHC, by protecting records of such resources from public disclosure under the California Public Records Act.

Native American Human Remains

Sites that may contain human remains important to Native Americans must be identified and treated in a sensitive manner, consistent with state law (i.e., Health and Safety Code §7050.5 and PRC §5097.98). In the event that human remains are encountered during project development, and in accordance with the Health and Safety Code Section 7050.5, the County Coroner must be notified if potential human bone is discovered.

The Coroner then would determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she would contact NAHC by telephone within 24 hours, in accordance with PRC Section 5097.98. The NAHC then would designate an MLD with respect to the human remains. The MLD then would have the opportunity to recommend to the property owner, or the person responsible for the excavation work, the means for treating or disposing, with appropriate dignity, the human remains and associated grave goods.

California Administrative Code, Title 14, Sections 4307 and 4308

These sections provide indirect protection to archaeological and paleontological features by indicating that no person should destroy, disturb, or deface these types of resources.

Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to historic preservation, and archaeological and cultural resources within the project area and vicinity for informational purposes.

City of San Diego General Plan

The City of San Diego general plan provides for city-wide policies and goals. Additional updates were made after its initial adoption, including the most recent in 2015. The following policies and goals pertain to cultural and paleontological resources and the proposed project (City of San Diego 2015):

- UD-A.7. Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify “conservation areas” that retain

original community character in sufficient quantity and quality, but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district.

- HP-A.2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.

- b. Encourage the consideration of historical and cultural resources early in the development review process by promoting the preliminary review process and early consultation with property owners, community and historic preservation groups, land developers, Native Americans, and the building industry.

City of San Diego Register of Historical Places Resources

The City of San Diego maintains a local historic register. The register includes any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object that is designated a historical resource by the city's Historical Resources Board. It also must meet one or more of the following designation criteria, which are similar to those for the CRHR.

- a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's, historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development.
- b. Is identified with persons or events significant in local, state or national history.
- c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.
- e. Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources.
- f. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the City (City of San Diego 2000).

City of San Diego Historic Resources Regulations

The City of San Diego has adopted historical resources regulations (§143.02 et. seq.). These regulations generally apply to proposed development when historical resources are present and specifically address utilities with regard to important archaeological sites.

In addition to the overall city plan and regulations, several of the local community plans also are relevant to cultural resources. These includes the Torrey Pines, the Via De La Valle, the Torrey Hills, and the North City plans.

Torrey Pines Community Plan

The Torrey Pines Community Plan identifies over 25 prehistoric and historic archaeological sites. “The Sorrento Valley/Los Peñasquitos Lagoon area of the Torrey Pines community is the site of the prehistoric Indian village of Ystagua. Ystagua has archaeological remnants unique to the area and is considered a Multiple Resource Area (MRA) by the National Register of Historic Places Guidelines” (City of San Diego Planning Department 2014a). As noted above, this resource is one of the exemplary Archaic period sites within the county and may provide clues regarding the types of artifacts that may be found in other contemporary sites. The proposed project is partially located within the Los Peñasquitos Lagoon.

The community plan includes two goals that pertain to cultural resources and preservation, namely to: identify, inventory, and preserve the unique paleontological, archaeological, Native American, and historic resources of Torrey Pines for their educational, cultural, and scientific values (Goal 4); and to “Preserve, enhance, and restore all natural open space and sensitive resource areas, including Los Peñasquitos Lagoon and associated uplands, Torrey Pines State Park and Reserve Extension areas with its distinctive sandstone bluffs and red rock, Crest Canyon, San Dieguito Lagoon and River Valley [...] and all selected corridors providing linkage between these areas.” Policy 11 states that public and private development “should incorporate site planning and design features that avoid or mitigate impacts to cultural resources. When sufficient plan flexibility does not permit avoiding construction on cultural resource sites, mitigation shall be designed in accordance with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission” (City of San Diego Planning Department 2014a).

Via De La Valle, Torrey Hills, North City Urbanizing Area Framework Plan

The City of San Diego’s community plans address the importance of archeological resources. However, specific measures beyond the recognition and identification of these resources are not incorporated into the community plans (City of San Diego Planning Department 2007, 2014b, 2014c). Paleontological resources also are discussed in the Torrey Hills community plan. Among the important areas within the planning area are those containing Ardath Shale. The community plan notes the need for paleontological monitoring when development occurs in these areas (City of San Diego Planning Department 2014b).

City of Del Mar Community Plan

The current version of the City of Del Mar Community Plan is dated August 3, 2017. The plan includes a variety of goals and policies to address the community as a whole, including cultural resources. One goal/policy in particular references archaeological resources:

K. Require development in areas of archeological significance to be reviewed by the City of Del Mar to ensure that such uses do not result in a permanent destruction of any archeological sites or cultural information.

1 According to the Community Plan (City of Del Mar 2017a), the following is important to note with
2 regard to archaeological sites:

3
4 Several archeological sites exist within Del Mar according to the San Diego Museum of
5 Man. Because vandalism may occur on these sites, information about their specific
6 location should remain confidential except where owners of property containing such
7 sites must be involved in their preservation. It can be said, however, that the following
8 general areas contain one or more sites:

- 9 1. North bluff area west of Camino del Mar.
- 10 2. In the vicinity of Turf Road and Via de la Valle.
- 11 3. On the north slopes of the Del Mar hills above Jimmy Durante Boulevard.
- 12 4. On the northeast slopes of the Del Mar hills above San Dieguito Drive.
- 13 5. Torrey Pines Terrace area.
- 14 6. Del Mar Canyon area.

15
16 As part of the City of Del Mar municipal code, “historic significance shall mean any structure and/or use
17 of a property which possesses a unique architectural style typifying a period of California or Del Mar
18 history; any property and/or structure which is listed on a site or federal register of historic places; any
19 property and/or structure which marks or represents a specific historic event; and/or any property and/or
20 structure which typifies the historic character of a specific area of the City” (City of Del Mar 2017b).

21 22 **5.5.5 Environmental Impacts and Assessment**

23 24 **Applicant-Proposed Measures**

25 The applicant has not incorporated applicant-proposed measures (APMs) into the proposed project to
26 specifically minimize or avoid impacts on cultural resources. As discussed in Chapter 4.0, the proposed
27 project would include *Project Design Features* and *Ordinary Construction Restrictions* that apply to
28 ground-disturbing activities associated with the proposed project’s construction activities (SDG&E 2017).
29 Specifically, these relate to: monitoring during construction to prevent material damage to potential
30 resources that may be accidentally discovered at a worksite; training of contractors to recognize potential
31 buried archeological and paleontological resources; and the protocols that contractors and construction
32 crew must followed upon such a discovery that could require preparation of a Research Design and Data
33 Recovery Program.

Significance Criteria

Table 5.5-3 includes the significance criteria from Appendix G of the CEQA Guidelines' cultural resources section to evaluate the environmental impacts of the proposed project.

Table 5.5-3 Cultural Resources Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a, b. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 or a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

The proposed project's construction activities could materially damage seven resources (both previously identified and newly identified) that are eligible for listing on the CRHR within work areas adjacent to the proposed project components. Of these seven resources, four are archaeological sites (CA-SDI-191; CA-SDI-193; CA-SDI-686; and CA-SDI-16653) and the other three are historical resources, including: the El Camino Real (P-37-014052), the Del Mar Racetrack (P-37-035936), and the Sorrento Valley Industrial Park (P-37-036430). Thus, for purposes of this analyses, these are considered historic resources pursuant to CEQA Guidelines Section 15064.5. Of the seven resources, the proposed project could potentially cause a substantial adverse change in the significance of the following four archaeological resources:

- CA-SDI-191, prehistoric habitation site;
- CA-SDI-193, unknown;
- CA-SDI-686, prehistoric habitation site; and
- CA-SDI-16653, prehistoric habitation site.

Three of the four sites are located in areas where overhead lines and utility poles would be removed, where stringing sites and temporary work area are proposed, and where soils-disturbing work underground would occur. Within and/or near Sites CA-SDI-191, CA-SDI-193, and CA-SDI-16653, utility poles would be removed from service, others topped, and guard structures installed. These sites would also be within the vicinity of stringing sites and undergrounding of existing facilities (Appendix D). Two of these sites are partially paved over (Foglia, Cooley, and Mello 2017). However, subsurface deposits may be present that could be damaged by the proposed project activities; if these

deposits were intact and were determined to maintain integrity, they could be eligible for listing on the CRHR under Criterion 4 (Foglia, Cooley, and Mello 2017).

One of the sites (CA-SDI-686) is partially located within/near the footprint of the proposed Pumpkin Patch staging area/fly yard. While unlikely that substantial soils-disturbing activities would occur at the Pumpkin Patch site (because that location would function as an accessory staging area to support construction activities at work sites along the utility corridors indicated in Chapter 4.0, "Project Description"), in the event that soils-disturbing activities were to occur at the proposed Pumpkin Patch yard or any other of the three staging areas, the applicant shall ensure that *Project Design Features* and *Ordinary Construction Restrictions* are implemented in conjunction with mitigation measure (MM) **MM CUL-1, MM CUL-2, MM CUL-3** and **MM CUL-4** to reduce or avoid potential impacts to cultural and archeological resources.

The El Camino Real (P-37-014052) also is located within the vicinity of the Pumpkin Patch staging area. The proposed project would not directly impact this resource. Impacts, if any were to occur, would be associated with changes in ambient noise levels and aesthetics associated with construction vehicles and perimeter fencing on the site under project conditions that under existing conditions is not used for construction staging.

Construction activities also would require ground disturbance within the vicinity of the historic Sorrento Tower within the industrial park and near the Del Mar Racetrack. Proposed ground-disturbing activities that could cause potential impacts would be those related to the removal of existing poles (e.g., excavation and some backfilling), topping poles, and to the placement of temporary stringing sites and work areas. Similar to the El Camino Real, no direct impacts to cultural resources are anticipated, aside from temporary, indirect (less-than-significant) aesthetic and noise impacts associated with construction activities.

With the implementation of **MM CUL-1** through **MM CUL-3**, construction would not change the significance of historical or archaeological resources. Buffers would be placed around known archaeological sites of significance (i.e., historical or archaeological resources) and would be referred to as sensitive environmental areas to maintain confidentiality of the specific locations. Monitors would be present in these locations to ensure that damage to these resources is avoided or minimized. The appropriate training would be implemented to alert relevant personnel to the presence of these sensitive resources. As a result, any potential impacts to known historical or archaeological resources would be less than significant with mitigation.

In the event that an unknown historical or archaeological resource is discovered during project construction, a significant impact would occur if the resource is deemed eligible for the CRHR. Impacts to unknown resources that may be considered historical or archaeological resources would be mitigated to less than significant through the implementation of **MM CUL-2** through **MM CUL-4**.

Ground-disturbing activities would be performed under the supervision of a qualified archaeologist, who would have the authority to stop or divert construction in the event of a newly discovered historical or archaeological resource. If a discovery were made, it would be recorded and handled in accordance with

protocols outlined in a Mitigation Monitoring and Reporting Program. Construction personnel would also be trained to spot possible resources as well as the legal requirements relating to ensuring that resource locations are kept confidential. As a result, any potential impacts to previously unknown historical or archaeological resources would be less than significant with mitigation.

In the event that ground-disturbing activities would be required during operation and maintenance, these activities would likely be conducted in areas that were previously disturbed during construction. Therefore, known historical or archaeological resources would not likely be encountered during this phase of the proposed project. Nonetheless, with implementation of MM CUL-2 through MM CUL-4, potential impacts to unknown historical or archaeological resources would be reduced to less than significant.

Mitigation Measures MM CUL-1 through MM CUL-4

The following mitigation measures shall be implemented to account for known historical or archaeological resources, unanticipated discoveries of historical or archaeological resources, and the potential to impact previously undocumented or unknown resources:

MM CUL-1: Archaeological Site Buffer. Buffers shall be established around each of the significant, known archaeological sites in areas where ground disturbance is anticipated, and the sites will be noted as “environmentally sensitive areas” to preserve confidential locational information as required by law. Information relating to the exact location of these sites shall be considered confidential and shall not be made publicly available to prevent unauthorized discovery and disturbance of archeological resources in conformance with state law.

The buffer may consist of radial silt fencing or other means of identifying the area in which construction or ground disturbance must be avoided. Mapping and other discoverable publications shall redact citations to the specific locations of these resources.

MM CUL-2: Cultural Resources Monitoring. The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project’s qualified archaeological monitor.

A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project via a Cultural Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days prior to the start of project activities. The Cultural Resources Monitoring Plan shall include, at minimum, information regarding the location of project work areas/sites requiring cultural resources monitoring, how monitoring will be conducted, and the respective roles and responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified archaeologist. Responsibilities for the CPUC-approved archaeological monitor shall include cultural resources monitoring and implementing stop-work authority in the event of an unanticipated cultural resources discovery during project activities. Responsibilities of the SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to recommence project activities after a stop-work order has been installed to protect potential cultural resources,

analysis and curation of materials, and preparation of a report detailing the results of monitoring activities results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.

Where cultural resources monitoring is needed at project work areas/sites within California State Parks lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.

MM CUL-3: Cultural Resource Training. Prior to construction, all SDG&E, contractor, and subcontractor personnel associated with the proposed project shall receive training in the appropriate work practices necessary to effectively identify and implement treatment of cultural resources and to comply with the applicable environmental laws and regulations, including those related to recognizing possible buried resources and maintaining the confidentiality of resources at in-situ locations. This training shall include how to identify cultural resources (e.g., the types of resources to look for) and what procedures are to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as paleontological resources.

MM CUL-4: Cultural Resource Discovery. In the event that cultural resources are discovered during construction, the applicant's archaeologist and Environmental Project Manager shall be contacted upon the time of discovery. The field resource specialist shall evaluate the significance of discovered resources using CRHR and NRHP criteria and accepted practices. The CPUC must concur with the treatment of significant resources before construction activities in the vicinity of the discovery shall be allowed to resume.

For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution or repatriated or redeposited in a secure location onsite if curation is infeasible. All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.

Significance: Less than Significant with Mitigation Incorporation

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources may be impacted by construction activities requiring ground disturbance. Surface grading or shallow excavations in the uppermost few feet of the younger Quaternary deposits would be unlikely to uncover significant fossil vertebrate remains. Excavations that extend more than 5 feet below ground surface (bgs) into sedimentary deposits, as well as any excavations into old and very old paralic deposits, Ardath Shale, the Delmar Formation, Torrey Sandstone, Scripps Formation, and undivided Eocene-age rocks (noted as having high potential for paleontological remains) would have the potential to uncover significant vertebrate fossils (Appendix I).

Excavations required for pole installation would range from 8 to 30 feet bgs. Trenching for duct bank installation would require excavations to between 6 and 9 feet bgs.

The proposed project would cross approximately 4.8 miles of geologic formations with a high paleontological potential. Several segments of TL674A would involve the installation of underground facilities within the Torrey Sandstone Formation and old paralic deposits. In addition, portions of the TL666D removal and the majority of C510 conversion activities would occur within paleontologically sensitive geologic formations, which similarly include the Torrey Sandstone Formation and very old paralic deposits. Excavations into artificial fill and landslide deposits would be unlikely to uncover significant fossil vertebrate remains, as they typically lack stratigraphic context and do not generally contain fossil vertebrate remains.

Construction activities that could potentially impact paleontological resources include the installation of underground facilities, pole installation, and removal of existing poles. The majority of the ground-disturbing activities required would occur during the installation of underground duct banks for the TL674A reconfiguration, C510 conversion, and C738 conversion. To minimize potential impacts to paleontological resources, the applicant would implement **MM CUL-5: Paleontological Resource Monitoring and Discovery**.

With the implementation of **MM-CUL 5** for paleontological resources, construction would not change the significance of known or unknown paleontological resources. A qualified paleontological monitor would be on site to observe excavation operations and divert or temporarily halt construction activities in the event that a fossil were encountered. Monitoring would be conducted in areas where ground-disturbing activities would occur within native sediments of the Eocene-age Ardath Shale, Delmar Formation, Torrey Sandstone, Scripps Formation, undivided Eocene deposits, and Pleistocene-age old and very old paralic deposits. This would not be required in areas where auguring of less than 3-foot-diameter holes would be needed. Full-time monitoring also would not be needed for excavations into young alluvial floodplain deposits, paralic estuarine deposits, and marine beach deposits. Excavations impacting depths greater than 5 feet into these sediments would be periodically spot-checked, since older geologic units with high paleontological potential may shallowly underlie younger surficial sediments. As previously stated, no monitoring is recommended for excavations into artificial fill and landslide deposits.

Mitigation Measure MM CUL-5: Paleontological Resource Monitoring and Discovery

The following mitigation measure shall be implemented to account for unanticipated discoveries and to avoid potential material damage to previously undocumented or unknown paleontological resources.

MM CUL-5. Paleontological Resource Monitoring and Discovery. A qualified paleontologist shall attend pre-construction meetings, when needed, to consult with the excavation contractor on schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as an individual with a master's or doctorate degree in paleontology or geology and who is experienced with paleontological procedures and techniques; who is knowledgeable in the geology and paleontology of San Diego County; and who has worked as a paleontological mitigation project supervisor in the region for at least one year.

The requirements for paleontological monitoring shall also be noted in the Paleontological Monitoring Plan to be prepared by the applicants and approved by the CPUC at minimum 30 days prior to construction beginning. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of a qualified paleontologist and shall be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits with high paleontological resource sensitivity (i.e., Torrey Sandstone Formation, old paralic deposits, and very old paralic deposits).

In the event that fossils are encountered, the paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with the applicant's Cultural Resource Specialist, shall determine the significance of the discovered resources. The applicant's Cultural Resource Specialist and Environmental Project Manager will need to concur with the evaluation procedures to be performed before construction activities are allowed to resume.

Small fossil remains may be present, and therefore a screen-washing operation may be set up onsite. If fossils are discovered, the paleontologist (or paleontological monitor) will recover them, along with pertinent stratigraphic data. The recovery of bulk sedimentary-matrix samples for offsite wet screening from specific strata may be necessary, as determined in the field. Any fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections. A final summary report will be completed that would outline the results of the recovery program. The report will discuss the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

Fossil remains collected during monitoring would be handled in accordance with **MM CUL-5**. Furthermore, construction personnel would receive training on the potential for exposing paleontological resources and how to recognize potential buried resources, along with procedures to follow if paleontological materials were to be discovered.

As a result, any potential impacts to paleontological resources would be less than significant with mitigation.

Significance: Less than Significant with Mitigation Incorporation

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

No human remains are known to exist within the proposed project's vicinity. However, to account for the potential that the proposed project could uncover, damage, or destroy human remains during ground-disturbing activities interred outside of formal cemeteries, California State Health and Safety Code Section 7050.5 dictates that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin and disposition pursuant to CEQA regulations and PRC Section 5097.98. If human remains are found, the applicant shall adhere to these requirements. Mandatory compliance with the requirements set forth in **MM CUL-6** and implementation of **MM CUL-1** through

MM CUL-4 would ensure that potential impacts associated with human remains during the construction phase would be less than significant with mitigation.

Mitigation Measure MM CUL-6: Treatment of Human Remains

The following mitigation measure shall be implemented to account for unanticipated discoveries of human remains and the potential to impact them:

MM CUL-6: Treatment of Human Remains. The applicant will follow current legal requirements at the time of discovery for the treatment of human remains. At present, pursuant to Section 5097.98 of the California PRC and Section 7050.5(e) of the California State Health and Safety Code Section and PRC Section 5097.98, if human remains or bone remains of unknown origin are found at any time during project-related construction activities, all work shall stop in the vicinity of the find, and the San Diego County Coroner shall be contacted immediately.

If the remains are determined to be Native American, the coroner shall notify the NAHC, who shall identify the person believed to be the MLD, who shall have at least 48 hours from notification of the find to comment. The landowner and MLD, with the assistance of the applicant and the archaeologist as requested, shall make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5(d)). If the MLD and the other parties do not agree on the reburial method, the requirements of PRC Section 5097.98(e) shall be implemented, which states that "...the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

Significance: Less than significant with mitigation incorporation.

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5.6 Geology and Soils

5.6.1 Environmental Setting

Geology

Topography along the project alignment ranges from nearly flat to steeply sloping. Elevations along the project alignment range from less than 10 feet to approximately 400 feet above mean sea level (USGS n.d.). The project alignment would be located on slopes that range from nearly flat to more than 25 percent (CSDOES and SDCUDC 2010). The project area is located in the western portion of the geomorphic province of California known as the Peninsular Ranges. The Peninsular Ranges province is bound on the east and north by the Colorado Desert and Transverse Ranges provinces, on the south by Mexico, and on the west by the edge of the continental shelf. The Peninsular Ranges are separated by northwest-trending valleys, subparallel to faults branching from the San Andreas Fault zone.

Geology in the Peninsular Ranges province is similar to that of the Sierra Nevada with granitic rocks intruding older metamorphic rocks (DOC 2002). Surficial geology underlying the various project components consists of either Quaternary alluvium, lake, playa, and terrace deposits that include some non-marine deposits near the coast, or Eocene sedimentary rocks that include shale, sandstone, conglomerate, and minor limestone (Jennings et al. 2010). Geologic units underlying project components C510, C738, TL666D, and TL674A are listed in Table 5.6-1 and displayed on Figure 5.6-1.

Table 5.6-1 Geology in the Project Area

Project Components	Map Symbol (Figure 5.6-1) and Description	Formation Age
TL674A Reconfiguration C738 Conversion	Q – Alluvium, lake, playa, and terrace deposits; unconsolidated and semi-consolidated. Mostly non-marine, but includes marine deposits near the coast.	Pleistocene ^(a) – Holocene ^(b)
TL666D Removal C510	Q – Alluvium, lake, playa, and terrace deposits; unconsolidated and semi-consolidated. Mostly non-marine, but includes marine deposits near the coast.	Pleistocene – Holocene
	E – Shale, sandstone, conglomerate, minor limestone; mostly well consolidated.	Eocene ^(b)

Source: Jennings et al. 2010

Notes:

^(a) Typically defined as the time period that began about 2,588,000 to 11,700 years ago.

^(b) Typically defined as the time period from about 11,650 years ago to present period.

^(c) Typically defined as the time period that began about 56 to 33.9 million years ago.

Soils

The soils in the project area have been mapped by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS). The NRCS maintains an online database of soil survey data for most U.S. counties through the soil survey geographic database (NRCS 2017). The NRCS soil survey data describe the types of soils that exist in an area, their locations on the landscape, and their suitability for various uses. Soils of a similar type are grouped into soil map units. The major soil map units within the project area are presented in Table 5.6-2. The extent of the soil series underlying project-specific utility lines are shown on Figure 5.6-2.

Table 5.6-2 Soils in the Project Area

Soil Map Unit (Map Symbol)	Description/ Soil Texture	Shrink- Swell Potential^(a)	Erosion Hazard^(b)	Wind Erodibility Group^(c)	Drainage
TL666D Removal					
Carlsbad gravelly loamy sand (CbC)	Gravelly loamy sand on uplands, ridges, swales; hillslopes with 5 to 9 percent slopes.	Low	Moderate	2	Moderately Well
Chino Silt Loam, Saline (CkA)	Silt loam on alluvial fans and alluvial plains with 0 to 2 percent slopes.	Low	Slight	4	Moderately Well
Corallitos loamy sand (CsB)	Loamy sand on narrow valleys and alluvial fans with 0 to 5 percent slopes.	Low	Slight	2	Somewhat Excessive
Corallitos loamy sand (CsC)	Loamy sand on narrow valleys; alluvial fans with 5 to 9 percent slopes.	Low	Moderate	2	Somewhat Excessive
Corallitos loamy sand (CsD)	Loamy sand on narrow valleys; alluvial fans with 9 to 15 percent slopes.	Low	Moderate	2	Somewhat Excessive
Huerhuero Loam (HrC)	Loam on valleys, hummocks, and marine terraces with 2 to 9 percent slopes.	High	Moderate	6	Moderately Well
Huerhuero Loam (HrC2)	Loam on valleys, hummocks, and marine terraces with 9 to 15 percent slopes, eroded.	High	Moderate	6	Moderately Well
Huerhuero Loam (HrD2)	Loam in valleys and on sideslope marine terraces with 9 to 15 percent slopes, eroded.	High	Severe	6	Moderately Well
Huerhuero Loam (HrE2)	Loam in valleys and on sideslope marine terraces with 15 to 30 percent slopes, eroded.	High	Severe	6	Moderately Well
Huerhuero-Urban Land Complex (HuC)	Urban land complex with 2 to 9 percent slopes.	High	Moderate	6	Moderately Well
Lagoon Water (LG-W)	Lagoon Water is considered a miscellaneous area by the NRCS; thus, they provide no unit description for it.	NA	NR	NR	NA
Loamy Alluvial Land-Huerhuero Complex (LvF3)	Loamy Alluvial Land-Huerhuero Complex on coastal plains and ridges with 9 to 50 percent slopes, severely eroded.	High	Severe	6	Moderately Well
Made Land (Md)	Made Land is considered a miscellaneous area by the NRCS; thus, they provide no unit description for it.	NA	NR	NR	NA
Terrace Escarpments (TeF)	Terrace Escarpments are considered miscellaneous areas by the NRCS; thus, they provide no unit description for them.	NA	NR	NR	NA
Tidal Flats (Tf)	Tidal Flats are considered miscellaneous areas by the NRCS; thus, they provide no unit description for them.	NA	NR	8	NA
Tujunga Sand (TuB)	Sand on flood plains and alluvial plains with 0 to 5 percent slopes.	Low	Slight	1	Somewhat Excessive

Table 5.6-2 Soils in the Project Area

Soil Map Unit (Map Symbol)	Description/ Soil Texture	Shrink- Swell Potential ^(a)	Erosion Hazard ^(b)	Wind Erodibility Group ^(c)	Drainage
TL674A Reconfiguration					
Grangeville Fine Sandy Loam (GoA)	Fine sandy loam on alluvial fans and alluvial plains with 0 to 2 percent slopes.	Low	Slight	3	Somewhat Poorly
Corallitos loamy sand (CsC)	Loamy sand on narrow valleys and alluvial fans with 5 to 9 percent slopes.	Low	Moderate	2	Somewhat Excessive
Huerhuero Loam (HrD2)	Loam in valleys and on sideslope marine terraces with 9 to 15 percent slopes, eroded.	High	Severe	6	Moderately Well
Huerhuero Loam (HrE2)	Loam in valleys and on sideslope marine terraces with 15 to 30 percent slopes, eroded.	High	Severe	6	Moderately Well
C510 Conversion					
Corallitos loamy sand (CsD)	Loamy sand on narrow valleys and alluvial fans with 9 to 15 percent slopes.	Low	Moderate	2	Somewhat Excessive
Terrace Escarpments (TeF)	Terrace Escarpments are considered miscellaneous areas by the NRCS; thus, they provide no unit description for them.	NA	NR	NR	NA
Tujunga Sand (TuB)	Sand on flood plains and alluvial plains with 0 to 5 percent slopes.	Low	Slight	1	Somewhat Excessive
C738 Conversion					
Made Land (Md)	Made Land is considered a miscellaneous area by the NRCS; thus, they provide no unit description for it.	NA	NR	NR	NA

Source: NRCS 2017.

Notes:

- ^(a) Linear extensibility of less than 3 percent = low shrink-swell potential; 3 to 6 percent = moderate potential; 6 to 9 percent = high potential; greater than 9 percent = very high potential. The reported values were calculated by the NRCS as shrink-swell potential. Soils with a moderate to high shrink-swell potential can damage buildings, roads, and other structures.
- ^(b) Erosion hazard indicates the susceptibility of a soil to sheet and rill erosion by water and is interpreted by the NRCS for unsurfaced roads and trails.
- ^(c) Soils are assigned to wind erodibility groups based on their susceptibility to wind erosion. Soils assigned to Group 1 are the most susceptible; soils assigned to Group 8 are the least susceptible.

Key:

NA = Not Available

NR = Not Rated

NRCS = U.S. Department of Agriculture, Natural Resources Conservation Service

TL674A

Soils underlying the proposed project's approximately 1.1-mile duct bank associated with the TL674A conversion consist of loam, fine sandy loam, and loamy sand on 0 to 30 percent slopes. Soil series underlying the TL674A conversion have low to high shrink-swell potential, pose slight to severe erosion hazard, and are somewhat poorly to somewhat excessively drained. Soil series underlying the TL674A conversion have low to high wind erodibility with wind erodibility group (WEG) rankings that range from 2 to 6. The soil series and map symbols underlying the TL674A conversion with high shrink-swell potential are the Huerhuero loams (HrD2 and HrE2) on 9 to 30 percent slopes. The soil series and map symbols underlying the TL674A conversion with severe erosion hazard rankings are the Huerhuero loams

(HrD2 and HrE2) on 9 to 30 percent slopes. The soil series and map symbols underlying the TL674A conversion with high wind erodibility rankings are the Corallitos loamy sand (CsC) and the Grangeville fine sandy loam (GoA).

TL666D

Soils underlying the proposed project's approximately 6-mile overhead TL666D removal consist of loam, sand, loamy sand, gravelly loamy sand, gravelly sandy loam, silt loam, sandy loam, loamy alluvial land complex, urban land complex, lagoon water, made land, terrace escarpments, and tidal flats on 0 to 50 percent slopes. Soil series underlying the TL666D removal have low to high shrink-swell potential, pose slight to severe erosion hazard, and are somewhat poorly to somewhat excessively drained. Soil series underlying the TL666D removal have low to high wind erodibility with WEG rankings that range from 2 to 8. The soil series and map symbols underlying the TL666D removal with high shrink-swell potential are the Huerhuero Loam (HrC, HrC2, HrD2, and HrE2) on 2 to 30 percent slopes and the loamy alluvial land-Huerhuero Complex (LvF3) on 9 to 50 percent slopes. The soil series and map symbols underlying the TL666D removal with severe erosion hazard rankings are the Huerhuero loam (HrD2 and HrE2) on 9 to 30 percent slopes and the loamy alluvial land-Huerhuero complex (LvF3) on 9 to 50 percent slopes. The soil series and map symbols underlying the TL666D removal with high wind erodibility rankings are the Carlsbad gravelly loamy sand (CbC), Corallitos loamy sands (CsB, CsC, and CsD), and the Tujunga sand (TuB).

C510

Soils underlying the proposed project's approximately 3,900-foot C510 Conversion to an underground configuration consist of terrace escarpments. Terrace escarpments are considered miscellaneous areas by the NRCS, and as such the NRCS does not provide description of shrink-swell potential, erosion hazard, WEG, or drainage for this particular line.

C738

Soils underlying the approximately 630-foot C738 Conversion duct bank consist of made land. Made land is considered a miscellaneous area by the NRCS, and as such the NRCS does not provide descriptions of shrink-swell potential, erosion hazard, WEG, or drainage for this particular line.

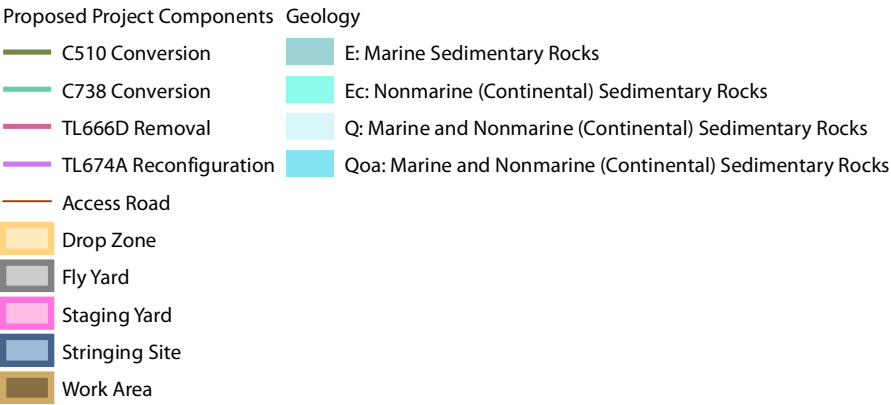
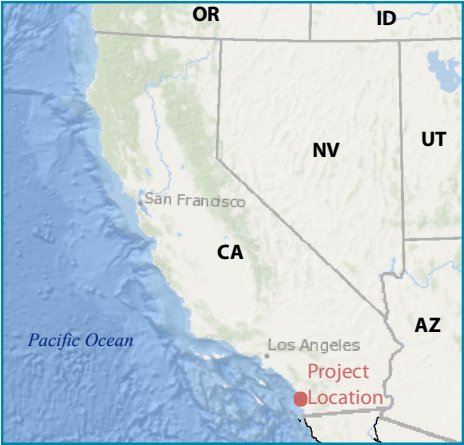
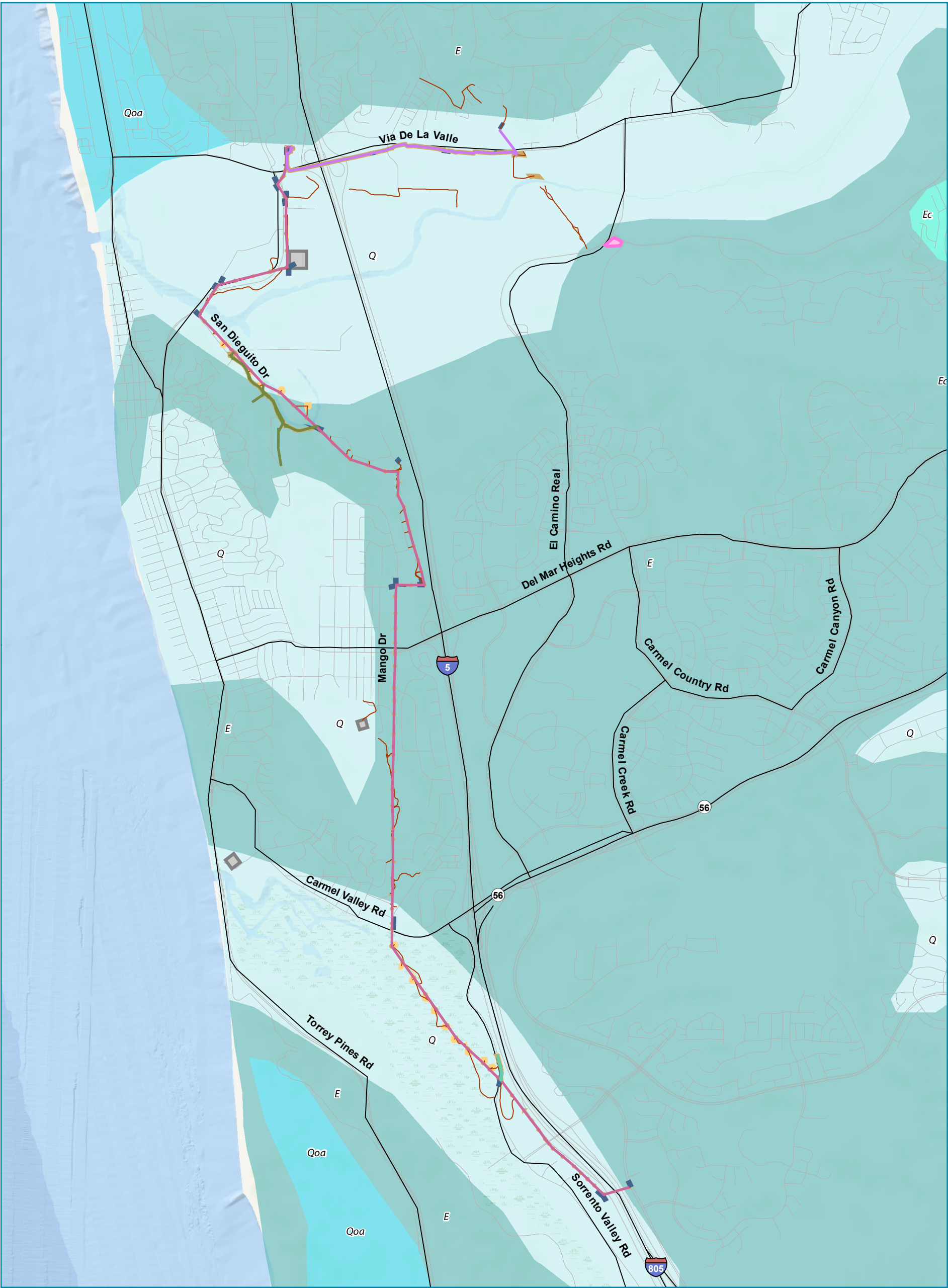
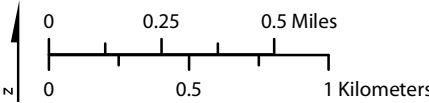
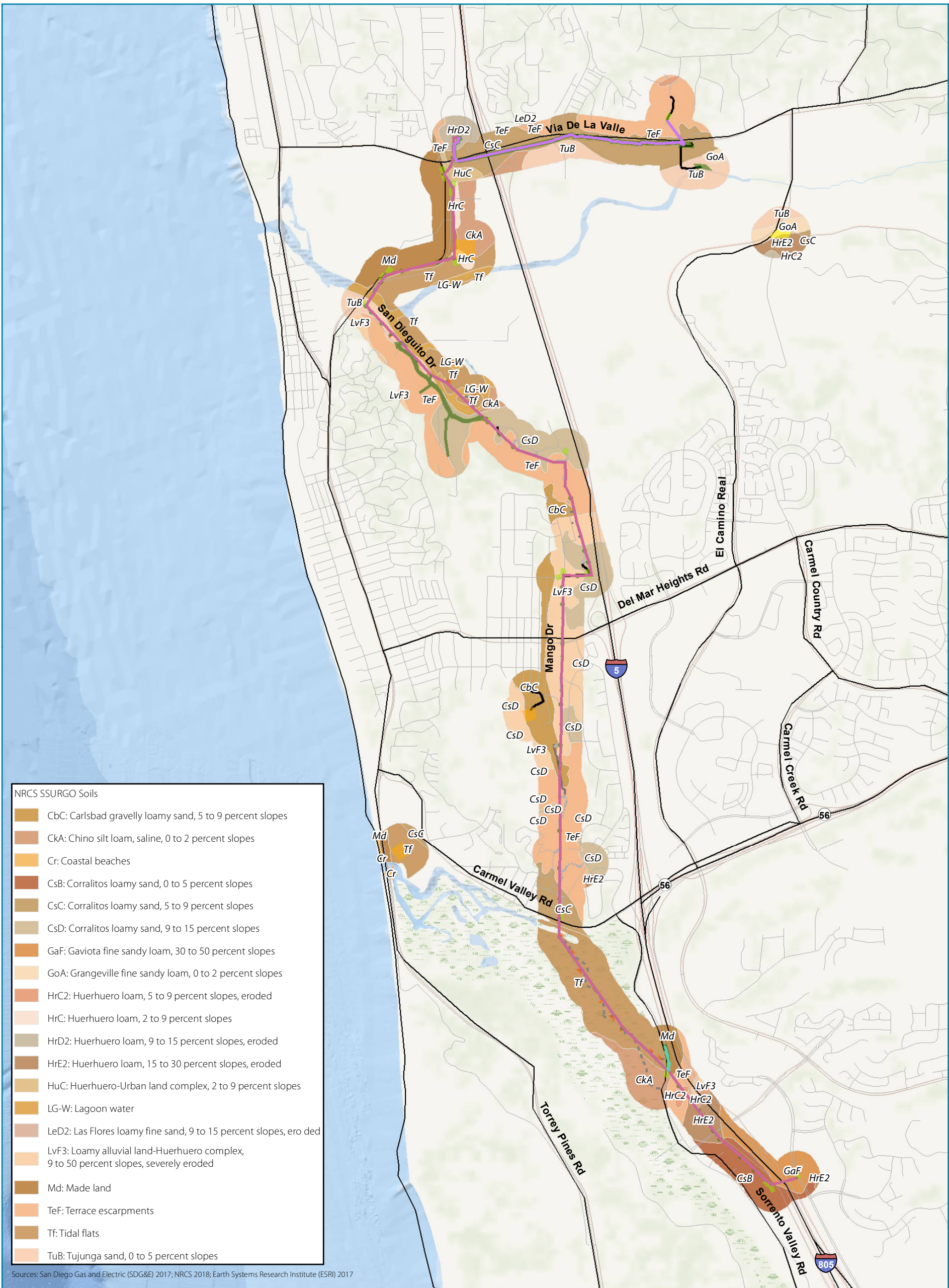


Figure 5.6-1
Geology in the
Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California
June 2018

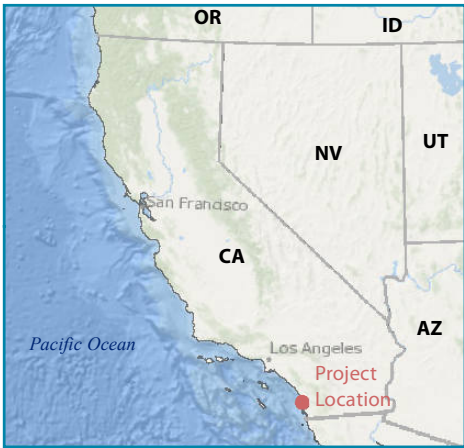


Sources: San Diego Gas and Electric (SDG&E) 2018; CAL DOC 2013; Earth System Research Institue (ESRI) 2018

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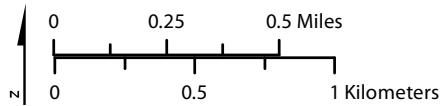


Sources: San Diego Gas and Electric (SDG&E) 2017; NRCS 2018; Earth Systems Research Institute (ESRI) 2017



- Proposed Project Components
- C510 Conversion
 - C738 Conversion
 - TL666D Removal
 - TL674A Reconfiguration
 - Drop Zone
 - Fly Yard
 - Staging Yard
 - Stringing Site
 - Work Area
- Existing Infrastructure
- Existing Access Road
 - Existing Footpath
 - Existing Footpath/ATV Access
 - Temporary Footpath

Figure 5.6-2
Soils in the
Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California
February 2018



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Geologic Hazards: Faulting and Seismicity

The Alquist–Priolo Earthquake Fault Zoning Act (Public Resources Code Division 7, Chapter 2.5) requires the delineation of earthquake faults for the purpose of protecting public safety. Faults included in the Alquist–Priolo Earthquake Fault Zoning Program are classified by activity as follows (DOC 2007):

- Faults classified as “active” are those that have been determined to be “sufficiently active and well defined,” with evidence of movement within Holocene time.
- Faults classified as “potentially active” have shown geologic evidence of movement during Quaternary time.
- Faults considered “inactive” have not moved in the last 1.6 million years.

Alquist-Priolo earthquake fault zones are designated areas within 500 feet of a known active fault trace. According to the California Geological Survey (CGS) online Alquist-Priolo fault zone mapping index, no Alquist-Priolo fault zone maps are available for the project area; therefore, no Alquist-Priolo fault zones cross any of the project components (DOC 2015).

The only active or potentially active fault underlying any project component is an unnamed Quaternary fault that crosses the TL666D project component near its center (Figure 5.6-3). In addition, a number of active and potentially active faults are located near the TL666D project component, which have the potential to cause strong ground shaking in the project area as a result of an earthquake. Active and potentially active faults near the TL666D project component are listed and summarized below. Active and potentially active faults within 25 miles of the proposed project are shown on Figure 5.6-3.

Faults generally produce damage in two ways: ground shaking and surface rupture. Seismically induced ground shaking covers a wide area and is greatly influenced by the distance to the seismic source, soil conditions, and groundwater depth. Surface rupture is limited to the areas closest to the faults. Other potential hazards associated with seismically induced ground shaking include earthquake-triggered landslides, liquefaction, and tsunamis. The following Fault Zones occur within the broader project vicinity.

- The Coronado Bank Fault Zone is located approximately 14 to 17 miles southwest of the TL666D utility corridor; a maximum moment magnitude¹ of 7.6 has been recorded along this fault zone.
- The Newport-Inglewood-Rose Canyon Fault Zone is located approximately 2 to 14 miles west of the TL666D utility corridor; a maximum moment magnitude of 7.1 is recorded along this fault zone. (Cao et al. 2003; Jennings and Bryant 2010)

¹ Maximum moment magnitude (Cao et al. 2003). The moment magnitude is a measure of the size of an earthquake in terms of energy released. An increase in moment magnitude represent a higher energy release.

Seven additional faults for which earthquake forecasting data (maximum moment magnitude) are not available are identified near the TL666D removal project component: the Florida Canyon Fault, Mission Gorge Fault, Murphy Canyon Fault, La Nacion Fault Zone, Point Loma Fault Zone, San Mateo-San Onofre-Carlsbad Fault Zone, and Texas Street Fault. The range in proximity of the seven faults to the TL666D removal project component is approximately 9 to 19 miles south. (Cao et al. 2003; Jennings and Bryant 2010)

Seismic hazards in a region are estimated by statistical analysis of earthquake occurrence to determine the level of potential ground motion. Magnitudes of historical earthquakes range up to moment magnitude 7.0. Four historical earthquakes over moment magnitude 4.0 have occurred within 25 miles of the project area. The locations of historical earthquakes and active or potentially active faults are shown on Figure 5.6-3.

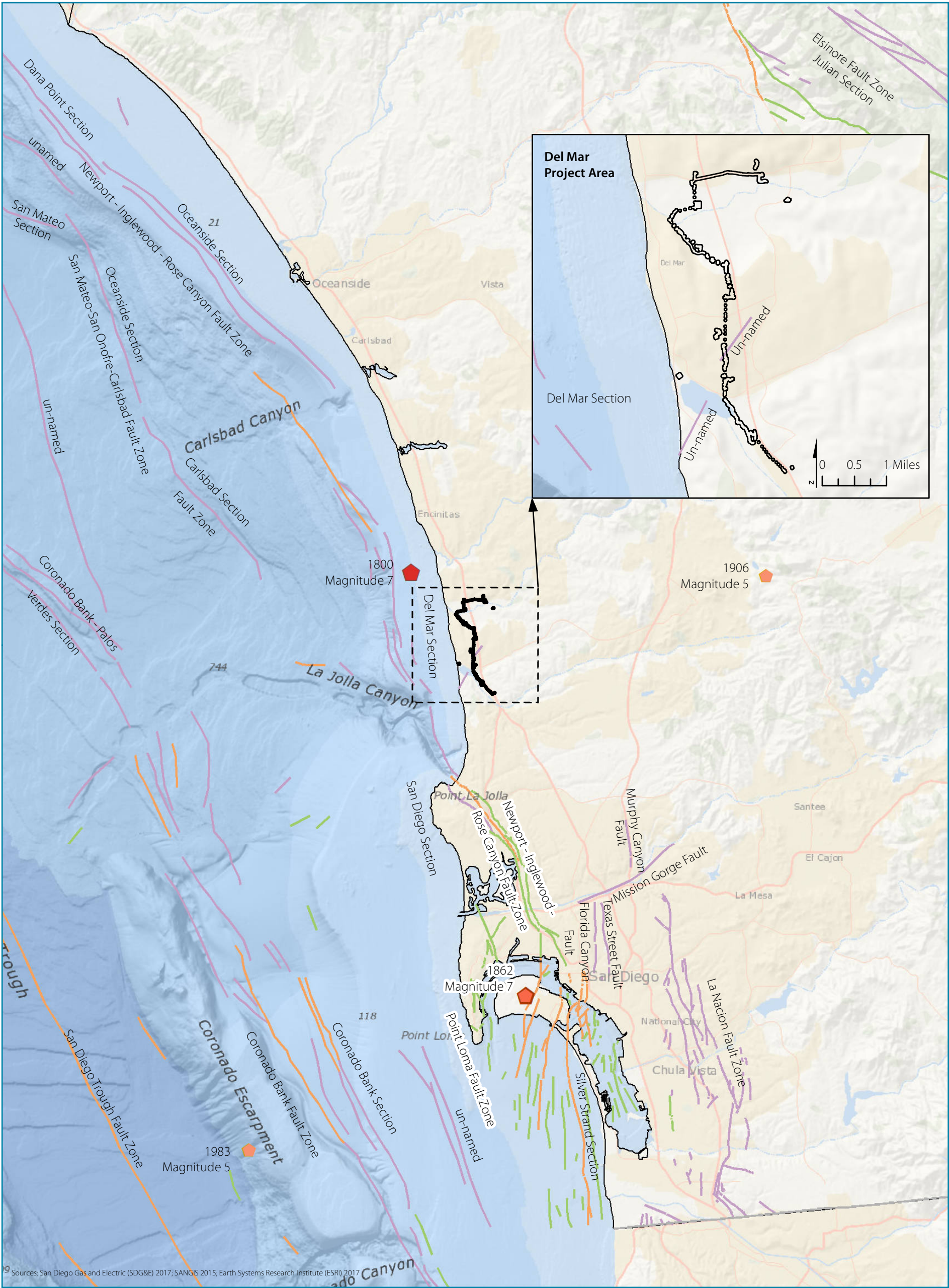
A common parameter used for estimating ground motion at a particular location is peak ground acceleration (PGA). PGA is a measure of earthquake intensity; it indicates how hard the earth shakes at a given location during the course of an earthquake. PGA values are typically expressed as a percentage of acceleration due to gravity: the higher the PGA value, the more intense the ground shaking.² PGA values in the project area were calculated by the CGS based on historical earthquake occurrence, known damage from historic earthquakes, slip rates of major faults, and geologic materials. The PGA values described below were obtained through the CGS online ground motion interpolator (DOC 2008).

The PGA values calculated by the CGS in the project area range from 0.492 to 0.525 times the force of gravity (g) with a 2 percent chance of being exceeded in 50 years. The PGA values calculated by the CGS with a 10 percent chance of being exceeded in 50 years range from 0.262 to 0.270 g. These PGA values represent low to moderate potential for ground shaking. PGA values vary throughout the project area and would be assessed as part of a site-specific geotechnical analysis. The assessed PGA values would be used to ensure that the proposed project structures are designed in compliance with applicable building codes.

Erosion

Water and wind are the processes responsible for most soil erosion within the proposed project area. Increased erosion could occur in the proposed project area where surface-disturbing activities occur, such as the use of access roads and trails; clearing vegetation; the burial of the duct bank in the TL674A conversion; and the conversion of overhead distribution lines to underground configurations in the C510 and C738 conversions.

² The acceleration due to gravity is relatively constant at the earth's surface: 980 centimeters per second per second (cm/sec/sec). An acceleration of 16 feet per second is $16 \times 12 \times 2.54 = 487$ cm/sec/sec. Therefore, an acceleration of 16 feet per second = $487/980 = 0.50$ g.

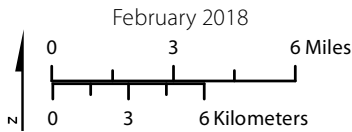


Sources: San Diego Gas and Electric (SDG&E) 2017; SANGIS 2015; Earth Systems Research Institute (ESRI) 2017



- Del Mar Proposed Project Components
- USA Historic Earthquakes Over Magnitude 4.0 With Year and Magnitude Noted
 - 6.1 - 7.0
 - 5.1 - 6.0
 - 4.1 - 5.0
- Faults
 - Holocene
 - Late Quaternary
 - Quaternary

Figure 5.6-3
Active and Potentially Active Faults
and Historic Earthquakes in the
Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California



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The NRCS assigns soils to WEGs. The susceptibility of the soils in the project area to wind erosion ranges from WEG 1 (highly susceptible) to WEG 8 (slightly susceptible), and most soils possess either high or low susceptibility. Soils that are highly susceptible to wind erosion are located at various locations along the 674A reconfiguration, TL666D removal, and C510 conversion (Figure 5.6-2). The NRCS ranks the erosion hazard of soils for roads and trails at the site ranging from slight to severe. Soils that rank with a higher than moderate erosion hazard are present at various locations along the TL674A conversion and TL666D removal (Figure 5.6-2). Soil characteristics in the project area are summarized in Table 5.6-2, above.

Landslides

Landslides may be naturally occurring or may result from construction activities that remove stabilizing vegetation, create over-steepened slopes, or concentrate runoff onto existing landslides or areas susceptible to landslides. The San Diego County Multi-jurisdictional Hazard Mitigation Plan (Hazard Mitigation Plan) maps landslides, landslide susceptibility, and slide-prone formations in San Diego County. The eastern terminus of the TL674A project component is located near, but not within, an area mapped as having slide-prone formations. No project components would cross areas mapped as susceptible to landslides, having known landslides, are or slide-prone formations, according to the Hazard Mitigation Plan. (CSDOES and SDCUDC 2010)

The CGS maps landslides on its California landslide inventory (DOC 2016). The CGS does not map landslides beneath any project component, and thus does not include any mapped lands that accommodate project infrastructure. The U.S. Geological Survey (USGS) maps the entire project area as having low landslide susceptibility (USGS 2001). Landslide susceptibility and occurrence areas are shown on Figure 5.6-4.

Liquefaction

Liquefaction occurs when seismic ground motion causes saturated sediments to flow like a fluid, resulting in sand boils or lateral spreading, both of which may cause a decrease in structural bearing capacity that can result in structural settlement or collapse. Liquefaction can occur during an earthquake in areas where unconsolidated sediments and a shallow water table are present, especially in lowland areas with saturated, sandy soil. The Hazard Mitigation Plan maps liquefaction risk and liquefiable soils (labeled on the plan map as liquefaction layers) in San Diego County. Portions of the TL666D project component cross areas of liquefiable soil within the San Dieguito River flood plain and the flood plain adjacent to Los Peñasquitos Lagoon. The fly yard located near Los Peñasquitos Lagoon is the only portion of the proposed project that would be located in an area mapped as having high liquefaction risk. All other project components would be located in areas mapped as having low liquefaction risk.

Subsidence/Collapsible Soil

Land subsidence can occur where large volumes of fluids are pumped out of the ground, such as in the case of groundwater wells or oil fields. Land subsidence occurs because the fluids present in subsurface pore spaces partially provide bearing capacity to support rock or sediments. When large volumes of fluids are pumped from the subsurface, land subsidence can result when rock or sediment partially collapses under its own weight into pore spaces previously occupied by fluids. Some soil may also collapse if it is

1 irrigated after remaining dry for long periods of time. The County of San Diego General Plan does not
2 discuss land subsidence or the presence of collapsible soil as hazards in the county. The Hazard
3 Mitigation Plan does not consider land subsidence or collapsible soils as significant hazards in the county.
4 Land subsidence was not considered in the risk assessment portion of the Hazard Mitigation Plan because
5 there is no historical record of land subsidence in the county and because it presents only a minor threat to
6 limited parts of the county.

8 **Expansive Soil**

9 Some soils contain certain clay minerals that may cause them to swell when moist and shrink as the soil
10 dries. These soils are known as expansive soils and have the potential to disturb and/or damage structures,
11 including power poles, vaults, transmission lines, and underground duct bank upon expansion. Table 5.6-
12 2 lists the soil types and characteristics of soils underlying the proposed project, including shrink-swell
13 potential. Project components that are at least partially underlain by soils with high shrink-swell potential
14 include the TL674A reconfiguration and the TL666D removal. The TL666D removal does not include
15 construction of structures that would be affected by expansive soils. The extent of various soil series
16 below the proposed project is shown on Figure 5.6-3. Special design features may be required in areas
17 where the proposed project would be underlain by soils with high shrink-swell potential.

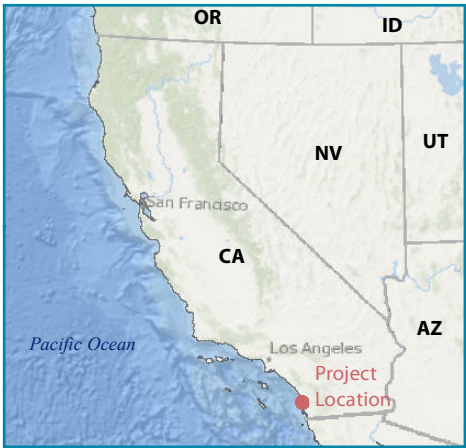
19 **5.6.2 Regulatory Setting**

21 This subsection summarizes federal, state, and local laws; regulations; and standards that govern geology,
22 soils, and mineral resources in the project area.

24 **Federal**

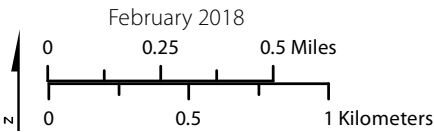
25 Clean Water Act

26 The Clean Water Act of 1972 (33 United States Code §1251 et seq.) requires states to set standards to
27 protect water quality, including the regulation of stormwater and wastewater discharge during
28 construction and operation of a facility. This act also created the National Pollutant Discharge Elimination
29 System (NPDES), a system that requires states to establish discharge standards specific to water bodies
30 and that regulates stormwater discharge from construction sites through the implementation of a
31 Stormwater Pollution Prevention Plan (SWPPP). The applicant will be required to compile a SWPPP for
32 the proposed project, in compliance with NPDES. Erosion and sedimentation control measures are
33 fundamental components of SWPPPs. In California, the NPDES permit program is implemented and
34 administered by Regional Water Quality Control Boards (RWQCBs). Refer to Section 5.9, “Hydrology
35 and Water Quality,” for further information.



- | | |
|------------------------------------|--------------------------------|
| Proposed Project Components | Existing Access Road |
| C510 Conversion | Existing Footpath |
| C738 Conversion | Existing Footpath/ATV Access |
| TL666D Removal | Temporary Footpath |
| TL674A Reconfiguration | Low Landslide Susceptibility |
| Drop Zone | California Landslide Inventory |
| Fly Yard | |
| Staging Yard | |
| Stringing Site | |
| Work Area | |

Figure 5.6-4
Landslides and Landslide
Susceptibility in the
Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California



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1 **State**

2 California Department of Industrial Relations, Occupational Safety and Health Regulations

3 Worker safety on construction projects, in particular where grading, trenching, and earthmoving are
4 involved, is the responsibility of the California Department of Industrial Relations, Occupational Safety
5 and Health Administration, which establishes and enforces regulations for excavation and trenching
6 permits and for worker safety. Certain elements of the proposed project would include grading, trenching,
7 and earthmoving.

8
9 Alquist-Priolo Earthquake Fault Zoning Act

10 The purpose of the Alquist-Priolo Earthquake Fault Zoning Act of 1972 is to regulate development near
11 active faults to mitigate the hazard of surface fault rupture. Development near active faults would include
12 any permanent construction such as the underground transmission lines that are part of the proposed
13 project. This act requires disclosure to potential real estate buyers and a 50-foot setback for new occupied
14 buildings. While it does not specifically regulate overhead power lines, it does help define areas where
15 fault rupture would most likely occur. Under the act, the State of California defines an active fault as one
16 exhibiting evidence that surface rupture has occurred within Holocene time (the last 11,700 years). The
17 state has identified active faults within California and has delineated “earthquake fault zones” along
18 active faults.

19
20 Seismic Hazards Mapping Act

21 The Seismic Hazards Mapping Act of 1990 provides a statewide seismic hazard mapping and technical
22 advisory program to assist cities and counties in fulfilling their responsibilities for protecting public
23 health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground
24 failure and seismic hazards caused by earthquakes. The proposed project would include installation of
25 poles on the TL674A, C510 and C738 project components that could pose public health and safety risks
26 from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and seismic
27 hazards caused by earthquakes. Mapping and other information generated pursuant to this act is to be
28 made available to local governments for planning and development purposes. The state requires that local
29 governments incorporate site-specific geotechnical hazard investigations and associated hazard mitigation
30 as part of the local construction permit approval process.

31
32 California Government Code

33 California Government Code Sections 65302(f) and 65302 require cities to take seismic and other natural
34 hazards into account in their planning programs and to outline them in their general plans.

35
36 California Building Standards Code

37 The California Building Standards Commission is responsible for coordinating, managing, adopting, and
38 approving building codes in California. Chapter 18 of the 2013 California Building Standards Code
39 regulates the excavation of foundations and retaining walls and specifies when geological reports are
40 required. Appendix J of the California Building Standards Code regulates grading activities, including
41 drainage and erosion control and construction on unstable soils, such as expansive soils and areas subject
42 to liquefaction.

California Public Utilities Commission General Orders 95, 128, and 165

California Public Utilities Commission (CPUC) General Order (G.O.) 95 Rules for Overhead Line Construction provides general standards for the design and construction of overhead electric transmission lines. CPUC G.O. 128 (Rules for Construction of Underground Electric Supply and Communication Systems) provides general standards for the construction of underground electric and communication systems. Additionally, CPUC G.O. 165 (Inspection Requirements for Electric Distribution and Transmission Facilities) establishes inspection requirements for electric distribution and transmission facilities (excluding facilities contained in a substation) to ensure safe and high quality electrical service. The proposed project would be designed and constructed in accordance with standards outlined in CPUC G.O. 95, CPUC G.O. 128, and CPUC G.O. 165.

Regional and Local

CPUC General Order 131-D, Section XIV.B

CPUC General Order 131-D states that “local jurisdictions acting pursuant to local authority are preempted from regulating electrical power line projects, distribution lines, substations or electrical facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects the public utilities shall consult with local agencies regarding land use matters.”

Regional Water Quality Control Board

The San Diego RWQCB manages water quality for the cities of San Diego and Del Mar because construction activities would occur within an area in excess of 1 acre, the applicant would be required to obtain a NPDES permit from the RWQCB. To acquire this permit, the applicant would prepare a SWPPP that would include information about the proposed project; monitoring and reporting procedures; and best management practices, including those for erosion, sedimentation, and stormwater runoff control. The SWPPP would be based on final engineering design. Refer to Section 5.9, “Hydrology and Water Quality,” for further information.

Local

The County of San Diego General Plan contains several policies related to geological hazards and development. These policies are directed at meeting the county’s goal to minimize the loss of life, injury, and property damage due to seismic and geologic hazards. These policies are not applicable to the proposed project, [Note to reviewer: this statement will be resolved in the next draft.] given the absence of expansive soils in the project area, Alquist-Priolo Fault Zone, and potential landslide hazard. (County of San Diego 2011)

5.6.3 Environmental Impacts and Assessment

Information for this section—including journals, maps, and databases—is sourced from the County of San Diego, NRCS, Northern California Earthquake Data Center, San Diego Gas & Electric (SDG&E), and the USGS and is evaluated within the context of applicable federal, state, and local laws, regulations, standards, and policies.

Applicant Proposed Measures

The only applicant-proposed measure (APM) applicable to this section is APM GEO-1, which has been evaluated for its potential to reduce the magnitude of project seismicity impacts. Implementation of APM GEO-1 would ensure multiple potential impacts pertinent to soils and geology would not rise to significant levels. Therefore, as a project design feature, no mitigation measures would be required because project geological impacts would be less than significant.

APM GEO-1: SDG&E will consider the recommendations and findings of a final geotechnical investigation and the contractor's Geotechnical Engineer regarding the potential for seismic activity, landslides, expansive soils, slope instability, and differential settling. SDG&E will incorporate those recommendations, as appropriate, into the final design of the proposed project. The final project design will be reviewed and approved by a Professional Engineer registered in the State of California prior to construction.

Significance Criteria

Table 5.6-3 includes the questions from Appendix G of the California Environmental Quality Guidelines for geology and soils to evaluate the environmental impacts of the proposed project.

Table 5.6-3 Geology and Soils Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Table 5.6-3 Geology and Soils Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known 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?

None of the project components would be located or are currently located within an Alquist-Priolo fault zone. Therefore, there would be no impact resulting from surface rupture of a known earthquake fault.

ii. Strong seismic ground shaking?

The existing circuits and additional project components would be implemented in an area of high seismic activity. Therefore, workers and the various project facilities could experience strong seismic ground shaking, although the proposed project would not exacerbate the existing seismic conditions in the area. The proposed project would be designed in accordance with all applicable regulations, including the California Building Code, during grading activities. Impacts to transmission lines, transmission poles, vaults, and duct banks may be significant given that they would be facilities that could be damaged during strong seismic ground shaking. Location-specific seismic analysis would be conducted during the project's final design phase. Final design would be reviewed by the various jurisdictions such as the CPUC, City of San Diego, City of Del Mar, California Department of Transportation, etc., and the final design of the proposed project would incorporate recommendations, as appropriate, from the geotechnical study, as described in APM GEO-1. Impacts associated with the risk of loss, injury, or death involving strong seismic ground shaking during construction and operation/maintenance of the proposed project would be less than significant with the implementation of the geotechnical study, incorporation of recommendations from the study, and compliance with all applicable regulations.

The existing circuits and additional project components would be implemented in an area of high seismic activity. Therefore, workers and the various project facilities could experience strong seismic ground shaking, although the proposed project would not exacerbate the existing seismic conditions in the area. The proposed project would be designed in accordance with all applicable regulations, including the California Building Code, during grading activities. Impacts to transmission lines, transmission poles,

vaults, and duct banks may be significant given that they would be facilities that could be damaged during strong seismic ground shaking. Location-specific seismic analysis would be conducted during the project's final design phase. Final design would be reviewed by the various jurisdictions such as the CPUC, City of San Diego, City of Del Mar, California Department of Transportation, etc., and the final design of the proposed project would incorporate recommendations, as appropriate, from the geotechnical study, as described in APM GEO-1. Impacts associated with the risk of loss, injury, or death involving strong seismic ground shaking during construction and operation/maintenance of the proposed project would be less than significant with the implementation of the geotechnical study, incorporation of recommendations from the study, and compliance with all applicable regulations.

iii. Seismic-related ground failure, including liquefaction?

The fly yard that would be located near Los Peñasquitos Lagoon is the only element of any project component that would be located in an area mapped as having high liquefaction risk. However, the fly yard would not involve construction of permanent or staffed facilities that would expose people or structures to potential substantial adverse effects related to liquefaction, and its use would be restricted to the construction phase of the proposed project.

Two poles would be installed as part of the TL674A project component. The new poles would be installed in an area that currently already has existing utility poles and other infrastructure present. As part of APM GEO-1, the applicant would conduct a geotechnical investigation that assesses the potential for lateral spreading and other geologic hazards at this site and throughout the project area. APM GEO-1 would require the applicant to prepare a geotechnical report, which would include design measures to minimize potential for ground failures. The geotechnical report would provide recommendations for engineering and design measures to incorporate into the proposed project to minimize impacts to structural components associated with geologic hazards. Final design would be reviewed by various jurisdictions, and the final design of the proposed project would incorporate recommendations, as appropriate, from the geotechnical study. Impacts associated with exposure of people or structures to potential substantial adverse effects, such as the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction during construction and operation/maintenance of the project would be less than significant with the implementation of the geotechnical study, incorporation of recommendations from the study, and compliance with all applicable regulations.

iv. Landslides?

None of the project components would be located in a landslide-prone area. All project components would be located in areas mapped as having low landslide susceptibility.

As part of **APM GEO-1**, the applicant would conduct a geotechnical investigation that assesses the potential for landslides and other geologic hazards. **APM GEO-1** would require the applicant to prepare a geotechnical report, which would include design measures to minimize potential for ground failures. The geotechnical report would provide recommendations for engineering and design measures to incorporate into the proposed project, including techniques for grading and pole installations, to minimize impacts associated with geologic hazards. Final design of the proposed project would incorporate

recommendations, as appropriate, from the geotechnical study. Impacts associated with exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides during construction and operation/maintenance of the proposed project would be less than significant with the implementation of the geotechnical study, incorporation of recommendations from the study, and compliance with all applicable regulations.

Significance: Less than Significant

b. Would the project result in substantial soil erosion or the loss of topsoil?

Soils within the project area have an erosion hazard rating of slight to severe. The majority of ground disturbance would occur during construction of duct banks, vaults, underground transmission lines, power poles, and foot paths, and improvements to drop zones, fly yards, staging yards, stringing sites, work areas, access roads, and existing foot paths. Erosion at these sites would occur as a result of wind, water, and tracking from construction vehicles and equipment that could cause topsoil to be blown away from the sites. Construction of the proposed project could potentially cause significant effects if the work areas are not properly stabilized and substantial erosion were to occur. Because the proposed project would disturb more than 1 acre, the applicant would be required to apply for coverage under the NPDES permit and obtain a Waste Discharge Identification. To obtain this permit, the applicant would be required to submit a project-specific SWPPP to the State Water Resources Control Board for approval. The applicant would use information about the physical properties of subsurface soils, soil resistivity, and slope stability data from the geotechnical study to inform development of the SWPPP, which is required for the proposed project, in compliance with NPDES.

The SWPPP would include a variety of erosion and sediment controls to reduce the potential for increased erosion and sedimentation that could result from construction of the proposed project. Erosion controls consist of source control measures that are designed to prevent soil particles from detaching and being transported in storm water runoff (e.g., applying soil binders, as appropriate, to areas that would remain disturbed for more than two weeks or scheduling major grading operations during non-rainy periods). The SWPPP would also require the applicant to install erosion control devices, where appropriate, such as straw mulch, geotextiles and mats, earth dikes and drainage swales, velocity dissipation devices (at culvert outlets), and slope drains to reduce erosion potential during construction.

In addition to erosion control measures, the SWPPP would require the applicant to implement sediment controls, which are structural measures intended to complement and enhance the selected erosion control measures and reduce sediment discharges from active construction areas. Examples of sediment control measures include silt fences, sediment traps, check dams, fiber rolls, gravel bag berms, street sweeping and vacuuming, and sandbag barriers. These measures would be implemented at appropriate locations throughout the project area as part of the implementation of the SWPPP. With the implementation of a project SWPPP, impacts under this criterion would be less than significant.

During operation and maintenance, the potential for soil erosion related to the proposed project would be low, due to adequate site drainage and surfacing improvements that would be installed as part of construction. In addition, temporary construction areas would be restored to preconstruction conditions

following the completion of construction. Routine operation and maintenance would not require significant grading or other ground disturbing activities, and further loss of topsoil would not occur. Long-term use of access roads may lead to rutting, which could concentrate runoff and increase rill erosion. However, the applicant would maintain erosion control features that were implemented as part of the SWPPP during the construction phase as needed during operations. Therefore, the proposed project would not result in substantial topsoil erosion or the loss of topsoil during operation and maintenance, so impacts would be less than significant under this criterion.

Significance: Less than Significant

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The Hazard Mitigation Plan does not consider land subsidence or collapsible soils as significant hazards in San Diego County. The impact from land subsidence and collapsible soils would be less than significant. Areas where the natural slope is steep and where landslides are known to occur, such as the landslide occurrence areas mapped by the USGS and the slide-prone formations mapped in the Hazard Mitigation Plan, could have increased landslide and lateral spreading susceptibility. However, none of the [project components would be located on a landslide, in an area mapped as susceptible to landslides, or in an area of slide-prone formations. Thus, the impact from landslides would be less than significant.

Liquefaction and lateral spreading could occur in lowland areas where saturated, sandy soil loses strength and cohesion due to ground shaking during an earthquake, such as in soils underlying project components that would span San Dieguito River and Los Peñasquitos Lagoon flood plains. Lateral spreading as a result of the proposed project is possible during an earthquake in areas where grading or excavation activities increase localized slope angles. The fly yard near Los Peñasquitos Lagoon is the only project component or work area that would be located in an area mapped as having high liquefaction risk. Except for the fly yard, liquefiable soils are present within the project area only in areas mapped as having low liquefaction potential.

As part of **APM GEO-1**, the applicant would conduct a geotechnical investigation that assesses the potential for liquefaction, lateral spreading, and other geologic hazards. The geotechnical report would include recommendations for engineering and design measures to incorporate into the proposed project to minimize impacts associated with geologic hazards. Final design of the proposed project would incorporate recommendations, as appropriate, from the geotechnical study. Impacts associated with the location of the proposed project on a geologic unit that is unstable, or that would become unstable as a result of the proposed project, and potentially result in liquefaction or lateral spreading during construction and operation/maintenance of the proposed project, would be less than significant with the implementation of the geotechnical study, incorporation of recommendations from the study, and compliance with all applicable regulations.

Significance: Less than Significant

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Expansive soils can cause structural failure of foundations such as those associated with permanent facilities such as duct banks, vaults, transmission poles, and transmission lines that would be built as part of the proposed project. The shrink-swell potential is an indicator of the potential for encountering expansive soil within a soil map unit. Project components that are at least partially underlain by soils with high shrink-swell potential are the TL674A reconfiguration and the TL666D removal. However, the TL666D removal does not include the construction of new structures that could be affected by expansive soil. If the site soils are not properly engineered, swelling and shrinking could result in ground failure and impacts would be significant. Two poles would be installed aboveground as part of the TL674A project component. The new poles would be installed in an area that currently already has existing utility poles and other infrastructure present. Further, the poles would follow recommendations for engineering and design measures, including techniques for grading and pole installations, to minimize impacts associated with geologic hazards on expansive soils.

As part of **APM GEO-1**, the applicant would conduct a geotechnical investigation that assesses the potential for expansive soil and other geologic hazards provides recommendations for engineering and design measures to incorporate into the proposed project to minimize impacts associated with identified hazards. Final design of the proposed project would incorporate recommendations, as appropriate, from the geotechnical study. Impacts associated with the location of the proposed project on expansive soil, creating substantial risks to life or property during construction and operation/maintenance of the proposed project, would be less than significant with the implementation of the geotechnical study, incorporation of recommendations from the study, and compliance with all applicable regulations.

Significance: Less than Significant

e. Would the project 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 waste water?

No septic tanks or alternative wastewater disposal systems are proposed to be constructed as part of the proposed project; thus, there would be no impact under this criterion.

Significance: No Impact

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5.7 Greenhouse Gases

5.7.1 Environmental Setting

Gases that trap heat in the atmosphere (i.e., greenhouse gases [GHGs]) regulate the earth's temperature and produce the GHG effect, which is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO₂) and water vapor. Other important GHGs include methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). GHGs are released into the earth's atmosphere through a variety of natural processes and human activities. Primary GHG emission sources are listed in Table 5.7-1.

Table 5.7-1 Greenhouse Gas Emissions Sources

Source Category	Example Activity/Source	GHG
Energy	Electricity generation	CO ₂
	Transportation	N ₂ O, CH ₄
Industry	Refrigeration and cooling	HFCs
	Semi-conductor manufacturing	PFCs
	Substations	SF ₆
Agriculture	Crop fertilization	N ₂ O
	Livestock	CH ₄
Waste	Landfill	CH ₄

The potential of a GHG to trap heat in the atmosphere is known as global warming potential (GWP). Each GHG has its own potency and effect upon the earth's energy balance, expressed in terms of its warming potential. The U.S. Environmental Protection Agency (EPA) defines GWP as "a measure of the total energy that a gas absorbs over a particular period of time (usually 100 years), compared to carbon dioxide" (EPA 2018). The reference gas for global warming potential is CO₂ and is assigned a GWP value of one. In contrast, because it is orders of magnitude stronger in trapping heat in the atmosphere than CO₂, SF₆ has a GWP value of 23,500. In GHG emissions inventories, the weight of each gas is multiplied by its GWP and is measured in units of equivalent CO₂ (CO₂e). Table 5.7-2 shows the GWP for the six GHGs previously mentioned.

Table 5.7-2 Greenhouse Gases and Global Warming Potential

Greenhouse Gas	Warming Potential ^(a)
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	25
Nitrous Oxide (N ₂ O)	298
Perfluorocarbons (PFCs) ^(b)	7,390–12,200
Hydrofluorocarbons (HFCs) ^(b)	92–14,800
Sulfur Hexafluoride (SF ₆) ^(b)	22,800

Source: EPA 2016

Notes:

^(a) Potential is expressed relative to that of carbon dioxide (CO₂) over a period of 100 years.

^(b) High global warming potentials include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆)

Scientific research has established a link between the amount of GHGs in the atmosphere and observed changes of the earth's climate. An expanding body of scientific research supports the theory that global climate change is currently affecting weather patterns, average sea level, ocean acidification, chemical reaction rates and precipitation rates. GHGs have direct and indirect effects on mean temperature, precipitation, ocean currents, wind patterns, and storm activity. The anthropogenic GHGs that are emitted in the greatest quantities are CO₂ and CH₄. Emissions of CO₂ are largely byproducts of fossil fuel combustion, whereas CH₄ results mostly from off-gassing associated with agricultural practices and landfills. Regulatory efforts to manage the anthropogenic drivers of global climate change focus on six primary GHGs.

In 2014, the United States was the world's second largest contributor to GHG emissions (WRI 2018), and California was the second largest contributor to GHG emissions in the United States (WRI 2018). The California Air Resources Board (CARB) compiles the California Greenhouse Gas Emission Inventory, which tracks statewide anthropogenic GHG emissions. The inventory provides estimates of anthropogenic GHG emissions within California, as well as emissions associated with imported electricity; natural sources are not included in the inventory. The inventory includes estimates for CO₂, CH₄, N₂O, SF₆, HFCs, and PFCs and covers the years 2000 through 2015.

Data sources from California and federal agencies, international organizations, and industry associations are used to calculate this GHG inventory. As illustrated in Table 5.7-3, the transportation sector accounts for the largest source of GHG emissions in the state, followed by industry and electricity generation sector contributions (CARB 2017). Also note that over the 15-year period, the state's gross GHG emissions declined by about 6 percent relative to the year 2000 baseline, while the state's population during that same period increased by 14 percent (from 33.9 million in 2000 to 39.03 million in 2015).

Table 5.7-3 California Greenhouse Gas Inventory for years 2000 and 2015

Source Category	2000 (million MTCO ₂ e)	2015 (million MTCO ₂ e)
Transportation	176.49	164.63
Industrial	96.24	91.71
Electric Power	104.84	83.67
Commercial and Residential	43.18	37.92
Agriculture	31.95	34.65
High GWP ^(a)	7.14	19.05
Recycling and Waste	7.35	8.73
Gross California GHG Emissions	467.19	440.36

Source: CARB 2017

Note:

^(a) High global warming potentials; includes hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃)

Key:

GHG = greenhouse gas

GWP = global warming potential

MTCO₂e = million metric tons of carbon dioxide equivalent

5.7.2 Regulatory Setting

5.7.2.1 Federal

Clean Air Act

In 2009, the EPA issued two separate findings regarding GHGs under Section 202(a) of the Clean Air Act:

- Endangerment Finding: states that the current and projected concentrations of the six key GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten public health and welfare of current and future generations.
- Cause or Contribute Finding: states that the combined emissions of GHGs from new motor vehicles and new motor vehicle engines contribute to GHG pollution that threatens public health and welfare.

These findings were a foundation for the EPA's regulation of vehicle GHG emissions. The EPA and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have finalized GHG emission reduction regulations for light-duty vehicles and heavy-duty engines (EPA 2015**6b**).

Final Rule on Mandatory Reporting of GHGs (40 CFR Part 98)

In 2009, the EPA established the Final Rule on Mandatory Reporting of Greenhouse Gases, which requires reporting of GHG emissions from large sources and suppliers in the United States. The rule intends to collect accurate and timely emissions data to inform future policy decisions. Facilities that emit 25,000 metric tons of CO₂e (MTCO₂e) or more per year are required to submit annual reports to the EPA.

Light-Duty Vehicle Standards

In collaboration with the NHTSA, the EPA finalized the program to reduce GHG emissions and improve fuel economy for light-duty vehicles (model years [MY] 2012 to 2016) in May 2010. The program was extended in 2012 to set more stringent standards for MY 2017 to 2025 light-duty vehicles. The revised standards are projected to reduce GHGs by approximately 2 billion metric tons and save 4 billion barrels of oil over the lifetime of MY 2017 to 2025 vehicles. Standards include fuel economy targets and improvements in vehicle technologies, including improved vehicle aerodynamics, reduced vehicle weight, lower tire rolling resistance, and expanded production of electric and hybrid vehicles.

Heavy-Duty Truck and Bus Standards

In 2011, the EPA and NHTSA announced the first-year program to reduce GHG emissions and improve the fuel efficiency of heavy-duty trucks and buses. The final combined standards of the program will reduce CO₂ emissions by about 270 million metric tons and save about 530 million barrels of oil over the life of MY 2014 to 2018 heavy-duty vehicles. The heavy-duty sector addressed in the EPA and NHTSA rules (including the largest pickup trucks and vans, semi-trucks, and all types and sizes of work trucks and buses in between) accounts for nearly 6 percent of total GHG emissions in the United States and for 20 percent of transportation emissions. The program includes standards for fuel consumption and emissions for combination tractors and vocational vehicles (i.e., vehicles equipped for a particular industry, trade or

occupation); N₂O and CH₄ emissions standards applicable to all heavy-duty engines, pick-ups, and vans; and standards for leakage of HCF refrigerants from air conditioning systems.

5.7.2.2 State

Assembly Bill 32 and Scoping Plan

In 2006, the Global Warming Solutions Act, Assembly Bill (AB) 32, was enacted, requiring a reduction of the state's GHG emissions to 1990 levels by 2020, consistent with EO S-3-05. AB-32 requires that CARB prepare and approve a Climate Change Scoping Plan (Scoping Plan) for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020. The Scoping Plan includes a range of GHG emission reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB-32 cost of implementation fee regulation to fund the program. The initial Scoping Plan was approved at the CARB hearing on December 12, 2008. CARB approved the First Update to the Scoping Plan in May 2014 (CARB 2014). In 2016, the Legislature passed SB32, which codifies a 2030 GHG emission reduction target of 40 percent below 1990 levels. Measures in the scoping plan are being adopted over time as regulations (CARB 2018).

GHG reduction measures contained in the Scoping Plan that are applicable to the proposed project include the Low Carbon Fuel Standard, regional transportation-related GHG targets, light-duty vehicle GHG standards, medium/heavy-duty vehicle GHG Standards, vehicle efficiency measures, goods movement, energy efficiency, high GWP gases, and recycling and waste. The California legislature has also passed legislation implementing most of the Climate Change Scoping Plan measures. Legislation applicable to the proposed projects is described below.

Executive Order B-30-15

In April 2015, Governor Brown signed E.O. B-20-15 establishing a new interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030. The interim reduction target was established to ensure that California meets its goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. E.O. B30-15 requires state agencies to consider climate change in planning and investment decisions, giving priority to actions that reduce GHG emissions.

Senate Bill 375 – Sustainable Communities Strategy

In 2008, Senate Bill (SB) 375 was adopted to achieve the GHG reduction targets established in the Climate Change Scoping Plan for the transportation sector through local land use decisions that affect travel behavior. In its relevant part, SB 375 requires CARB to set regional targets for GHG emission reductions from passenger vehicles and light duty trucks. On November 11, 2011, CARB accepted the San Diego Association of Governments (SANDAG)—which includes San Diego County—determination that its adopted Sustainable Communities Strategy would meet or exceed the regional GHG emissions reduction goals of 7 percent by 2020 and 13 percent by 2035 (CARB 2011).

Executive Order S-21-09

E.O. S-21-09 was enacted on September 15, 2009. It requires that CARB, under its AB-32 authority, adopt a regulation by July 31, 2010, that sets a 33 percent renewable energy target by 2020, as established in E.O. S-14-08. Under E.O. S-21-09, CARB will work with the CPUC and Council on Environmental Quality (CEQ) to encourage the creation and use of renewable energy sources, and will regulate all California utilities. CARB will also consult with the California Independent System Operator (ISO) and other load balancing authorities regarding impacts on reliability, renewable integration requirements, and interactions with wholesale power markets in carrying out the provisions of the Executive Order. The order requires CARB to give highest priority to resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health.

Senate Bills 1078 and Executive Order S-14-08

SB 1078 requires retail sellers of electricity to provide at least 20 percent of their supply from renewable sources by 2017. In November 2008, Governor Schwarzenegger signed E.O. S-14-08, which expands the Renewables Energy Standard to 33 percent by 2020. In April 2011, the California legislature enacted SB X1-2, which mandates the Renewables Portfolio Standard of 33 percent by 2020 for investor-owned and public owned utilities.

5.7.2.3 Regional and Local

The proposed project would not be subject to local discretionary regulations because the CPUC has exclusive jurisdiction over the siting, design, and construction of the proposed project. However, the following discussion of local regulations relating to GHG emissions is provided for informational purposes. As explained in the following subsections, the construction, operation, and maintenance of the proposed project would not conflict with any environmental plans, policies, or regulations adopted by agencies with jurisdiction over local regulations related to GHG emissions.

San Diego Association of Governments' 2014 Regional Energy Strategy

The 2014 Regional Energy Strategy is an energy policy guide used to support decision-making by the San Diego Association of Governments and its member agencies through 2050, with the goal of assisting the San Diego region in meeting the energy needs of a growing population, housing stock, and workforce, while maintaining and enhancing regional quality of life and economic stability. To accomplish these objectives among other things, the Regional Energy Strategy calls for increased use of natural gas for certain transportation applications and the continued efficient use of electricity generation.

County of San Diego Climate Action Plan

The County of San Diego developed its Climate Action Plan (CAP) in 2012 to address the issues of growth and climate change, safeguard the environment for residents and visitors, and reduce county GHG emissions consistent with state legislative requirements. Emissions reduction measures outlined in the CAP include increasing transit use, walking and biking, and ridesharing (County of San Diego 2017). In July 2015, the County of San Diego initiated work on the revised CAP, and the county's Board of Supervisors adopted it on February 14, 2018. The CAP includes strategies and measures to reduce GHG emissions from "county operations," i.e., GHG emissions generated by facilities and operational activities throughout the county, including facilities and operations located within incorporated cities. In addition to strategies and measures to reduce GHG emissions, the CAP also includes a threshold of significance for

GHG emissions and revised Guidelines for Determining Significance for Climate Change (County of San Diego 2018a, 2018b).

City of San Diego Climate Action Plan

The City of San Diego adopted its CAP in December 2015 to proactively address environmental concerns, such as achieving GHG reduction targets in line with E.O. S-3-05. This CAP includes a municipal operations and community-wide GHG emissions baseline calculation from 2010, and sets a target of achieving a 15 percent reduction from the baseline by 2020 and an 80 percent reduction by 2050. Measures to achieve these targets include strategies centered around energy and water efficient buildings, clean and renewable energy, transit and land use, zero waste, and climate resiliency (City of San Diego 2015).

5.7.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

SDG&E has not incorporated applicant-proposed measures into the proposed project to specifically minimize or avoid impacts related to GHGs. However, SDG&E has been engaged for many years in efforts to reduce GHG emissions. SDG&E would submit a mandatory Long-Term Procurement Plan to the CPUC, describing its strategy to meet forecasted load during the next 10 years. This plan must be consistent with the “Loading Order” prescribed in the Energy Action Plan to meet growth first with conservation, then with renewable sources of electricity, and finally with new fossil fuel sources to the extent necessary. These efforts will reduce carbon intensity by one-third while accommodating continued population growth, and will ensure conformity with the applicable plans, policies, and regulations adopted by California to reduce GHG emissions.

Significance Criteria

As noted in the “Regional and Local Regulatory Setting,” above, San Diego County’s CAP includes strategies and measures to reduce GHG emissions from county operations. It aims to meet the state’s 2020 and 2030 GHG reduction targets and demonstrate progress towards the 2050 GHG reduction goal.

As explained in the CAP’s companion document, *Guidelines for Determining Significance for Climate Change*, the CAP establishes a threshold of significance for evaluating climate change impacts under CEQA. The significance threshold states: “A proposed project would have a less-than-significant cumulatively considerable contribution to climate change impacts if it is found to be consistent with the County’s Climate Action Plan; and, would normally have a cumulatively considerable contribution to climate change impacts if it is found to be inconsistent with the County’s Climate Action Plan” (County of San Diego 2018). The proposed project would encompass approximately 8 miles of electrical utility corridors spanning two municipalities, each with an adopted CAP, in addition to San Diego County’s CAP, which addresses GHG emissions in unincorporated areas.

The proposed project does not represent an expansion of electrical service and would not directly or indirectly induce population growth. Upon implementation of the proposed project, the electrical network would be reconfigured underground to replace three (segments of) circuits that currently exist in a high-wire over land connection.

While the proposed project is a reconfiguration/rerouting of existing transmission lines, as opposed to energy generation, its operation would not therefore represent a substantive change to existing operational characteristics or output capacities of existing circuits. For this project, GHGs would be generated solely by construction, and the anticipated amounts are based on modeling (Appendix E).

Further, the CPUC took a conservative approach by using the South Coast Air Quality Management District's (SCAQMD's) GHG thresholds in this analysis. The SCAQMD prepared the *Interim CEQA GHG Thresholds for Stationary Sources, Rules, and Plans*, which sets the GHG significance threshold for industrial uses at 10,000 MTCO₂e per year. Thus, an industrial project would not generate GHG emissions that would have a significant impact on the environment if the emissions were below this significance threshold. The SCAQMD has not set specific thresholds for construction; rather, the SCAQMD and the County of San Diego recommend amortizing (gradually reducing) construction emissions over a 30-year period in the impact analysis to account for their contribution to GHG emissions over the lifetime of the proposed project.

Table 5.7-4 includes the significance criteria from Appendix G of the CEQA Guidelines' GHG section to evaluate the environmental impacts of the proposed project.

Table 5.7-4 Greenhouse Gases Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

The primary source of GHG emissions associated with the proposed project would be fossil fuel combustion from vehicles, construction equipment, and helicopter-use during construction. GHG emissions for construction were calculated using the same approach as criteria pollutant emissions for overall construction emissions (see Section 5.3, "Air Quality," for more information). Estimated GHG emissions are summarized in Table 5.7-5, below. The proposed project's total annualized construction CO₂e emissions of ~~32.55~~ 35.12 metric tons would be below the SCAQMD's significance threshold of

10,000 MTCO₂e emissions annually. Thus, the proposed project's GHG emissions would be less than significant.

Table 5.7-5 Greenhouse Gas Construction Emissions

Category	GHG Emissions (MT)		
	CO ₂	CH ₄	N ₂ O
Construction Equipment and Vehicles	899.66	0.16	0.00
Helicopter Use ^(a)	73.50	0.00	0.00
<u>Substation Modifications</u>	<u>23.31</u>	<u>0.01</u>	<u>0.00</u>
Total Construction Emissions	<u>973.16</u>	<u>0.16</u>	0.00
	<u>977.47</u>	<u>0.17</u>	
Global Warming Potential	1	21	310
CO ₂ e	<u>973.16</u>	<u>3.44</u>	0.00
	<u>996.47</u>	<u>3.57</u>	
Total CO ₂ e	<u>976.6</u>		
	<u>1,000.04</u>		
Amortized Construction Emissions (Amortized over 30 years)	<u>32.55</u>		
	<u>33.33</u>		
<u>Annual Fugitive SF₆ Emissions^(b)</u>	<u>1.79</u>		
<u>Total Annual CO₂e</u>	<u>35.12</u>		
SCAQMD Significance Threshold	10,000		
SCAQMD Significance Threshold Exceeded?	No		

Notes:

^(a) See Appendix E, *Greenhouse Gas Helicopter Emission Report*, for helicopter greenhouse gas emission estimates during construction.

^(b) The replacement of an existing circuit breaker (which is needed to meet new SDG&E design standards) at the Del Mar Substation will contain approximately 33 pounds of SF₆, with a maximum annual leak rate of 0.5 percent.

Key:

CH₄ = methane

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

MT = metric tons

N₂O = nitrous oxide

SCAQMD = South Coast Air Quality Management District

SDG&E = San Diego Gas and Electric Company

SF₆ = sulfur hexafluoride

Activities associated with the removal of the existing oil-filled circuit breaker and replacement with a modern SF₆ breaker is accounted for as part of the various project activities that could generate GHG and contribute to climate change.

GHG emissions during operation and maintenance of the proposed project would be relatively low, resulting only from scheduled operation and maintenance activities, which would be conducted in the same manner as they were prior to implementation of the proposed project. The proposed underground duct banks within Via De La Valle would be installed parallel to existing facilities where operation and maintenance activities are currently conducted. Further, the removal of approximately 6 miles of 69-kilovolt power lines from TL666D would eliminate all future operation and maintenance activities associated with that facility. Converting C510 and C738 would eliminate the operation and maintenance requirements currently associated with approximately 4,530 feet of existing overhead distribution line. Removal of existing overhead facilities and installation of the proposed project's components in areas already covered by existing operation and maintenance activities would reduce post-construction operation and maintenance requirements in the project area. These activities would not generate an

represent a substantial increase in GHG emissions when compared to their current levels emissions resulting from existing operation and maintenance activities; therefore, GHG emissions during the proposed project's operation and maintenance activities would be less than significant.

Significance: Less than Significant

b. Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Table 5.7-6 sets forth the relevant plans, policies, and regulations that address statewide actions aimed at meeting GHG reduction targets. Implementation of the project would not create a new source of GHG emissions. The electrical network would function in a manner similar to existing conditions upon implementation of project reconfigurations. If the proposed project meets its stated objectives, proposed reconfigured infrastructure would operate with greater reliability because lines that had been exposed to the elements in areas difficult to access would now be underground, protected from wind and fire and other risks.

Table 5.7-6 Project Conformity with Plans, Policies, and Regulations

Plan, Policy, or Regulation	Conformity Evaluation
Federal Vehicle Emissions Standards	The proposed project would utilize vehicles subject to federal vehicle regulations and would therefore comply with federal vehicle emissions standards. The proposed project would not conflict with this regulation.
Mandatory Reporting of Greenhouse Gas Emissions	The proposed project would emit less than 25,000 metric tons of GHGs per year, as discussed under significance criterion (a). Therefore, mandatory reporting requirements would not apply to the proposed project.
AB-32 California Climate Change Scoping Plan	The proposed project would be subject to and comply with policies and measures in the AB-32 Californian Climate Change Scoping Plan (Scoping Plan) that have been and will be implemented as regulations. The California Climate Change Scoping Plan sets forth GHG reduction measures such as energy efficiency, recycling and waste reduction, and the Low Carbon Fuel Standard and light and heavy-duty GHG standards. The proposed project would be in compliance with fuel, vehicle, and recycling measures. The proposed project's GHG emissions would not exceed the state's quantitative GHG thresholds, which were developed to comply with the California Climate Change Scoping Plan statewide reduction target.
Executive Order S-01-07—Low Carbon Fuel Standard	The proposed project would utilize vehicles subject to federal vehicle regulations and would therefore comply with federal vehicle emissions standards. The proposed project would not conflict with the low carbon fuel standard.
California Renewable Energy Programs	In 2002, California established its Renewables Portfolio Standard with the goal of increasing the state's use of renewable energy to 20 percent of total energy use by 2017, and subsequent Executive Orders accelerated that goal to 33 percent by 2020 and established renewable energy standards for interim years. Because the proposed project would not involve a decrease or increase in renewable energy generation or aim to specifically increase import of renewable energy, standards outlined in the California Renewable Energy Programs do not apply to the proposed project.
Executive Order B-30-15	Executive Order B-30-15 establishes a new interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030 and requires state agencies to give priority to actions that reduce GHG emissions in their planning and investment decisions. The proposed project would not significantly increase GHG emissions in the project area during construction or operations and maintenance. The proposed project would therefore not conflict with Executive Order B-30-15.

Table 5.7-6 Project Conformity with Plans, Policies, and Regulations

Plan, Policy, or Regulation	Conformity Evaluation
Advanced Clean Cars Program	New vehicles (i.e., manufactured between 2017 and 2025) purchased for the proposed project would comply with regulations in the Advanced Clean Cars Program. Therefore, the proposed project would not conflict with the Advanced Clean Cars Program.
Heavy-Duty Truck GHG Regulations	Heavy duty trucks and trailers used for the proposed project would comply with state GHG regulations pertaining to those types of equipment. Therefore, the proposed project would therefore not conflict with heavy-duty truck GHG regulations.
On-Road Heavy Duty Diesel Vehicle Regulations	Heavy duty diesel vehicles used for the proposed project would comply with state GHG regulations pertaining to those types of equipment. The proposed project would therefore not conflict with on-road heavy-duty diesel vehicle regulations.
State Regulations for Reducing SF ₆ Emissions from Gas Insulated Switchgear (17 CCR Sections 95350 to 95359)	State Regulations for Reducing SF ₆ Emissions from Gas Insulated Switchgear limit SF ₆ emissions from all gas-insulated equipment to 1 percent per year by 2020. Such equipment used on the proposed project would possess a manufacturer's certified SF ₆ leak rate of 0.5 percent per year or less. The applicant would also implement best management practices to reduce SF ₆ emissions during operations and maintenance of the proposed project, and would report SF ₆ emissions from the use of gas-insulated equipment on the proposed project to CARB, as required by this regulation. Therefore, the proposed project would not conflict with state SF ₆ regulations.
California Green Building Code (CCR, Title 24, Part 11)	The project proponent would be required to comply with nonhazardous construction and demolition waste requirements, as outlined in the California Green Building Code, for the construction and demolition of nonresidential building structures. Therefore, the proposed project would not conflict with this regulation.
AB-1826	Waste materials generated during construction of the proposed project would be salvaged, recycled, or disposed of in the appropriate manner and in compliance with applicable regulations. Therefore, the proposed project would not conflict with this regulation.
San Diego County Climate Action Plan	The County of San Diego adopted its Climate Action Plan in June 2012 to address climate change in the county. In November 2013, the county released its Guidelines for Determining Significance for Climate Change which includes a framework for determining the significance of GHG emissions from developed projects. The guidelines state that a project would have a significant impact if it increases operational greenhouse gas emissions by 2,500 MTCO ₂ e per year. ^(a) Since the proposed project's estimated total CO ₂ e is less than this threshold, it would not cause a significant impact and would not conflict with the San Diego County Climate Action Plan.
City of San Diego Climate Action Plan and City of San Diego Development Services draft GHG significance thresholds.	In February 2014, the City of San Diego released its Draft Climate Action Plan, which identifies measures to effectively meet GHG reduction targets for 2020 and 2035. In March 2013, the City of San Diego Development Services Department released draft GHG significance thresholds of 2,500 MTCO ₂ e per year) may be used for all land use development projects other than stationary sources. Since the proposed project's estimated total CO ₂ e is less than this threshold, it would not cause a significant impact and would not conflict with the City of San Diego Climate Action Plan.

Note:

^(a) Though this threshold was invalidated through legal action in 2014, it was used as a reference for purposes of this analysis.

Key:

AB = Assembly Bill

AB-32 California Climate Change Scoping Plan = Scoping Plan

CCR = California Code of Regulations

GHG = greenhouse gas

MTCO₂e = metric tons of carbon dioxide equivalent

SF₆ = sulfur hexafluoride

- 1
- 2 Given that project implementation would not create new GHG emissions, and for the reasons set forth in
- 3 Table 5.7-6, the proposed project would not conflict with any the plans, policies, or actions adopted for
- 4 the purpose of reducing GHG emissions. Further, while project construction activities would generate

GHG emissions, these would be below significance thresholds as discussed in the analysis under criterion (a). The proposed project would neither hinder nor obstruct the achievement of the various goals established to reduce GHG emissions. It would not contribute considerably to cumulative GHG impacts.

Significance: Less than Significant

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5.8 Hazards and Hazardous Materials

Definitions

The U.S. Department of Homeland Security defines “hazard” as a natural or man-made source or cause of harm or difficulty (DHS 2010). California health and safety statutes define the term “hazardous material” as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment (California Health and Safety Code [HSC], Chapter 6.95, Section 25501). Under Title 22 of the California Code of Regulations (CCR), the term hazardous material is further defined as:

A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR, Title 22, Section 66260.10).

California health and safety statutes and regulations specifically define the term hazardous waste to include waste regulated by the Resource Conservation and Recovery Act (RCRA), extremely hazardous waste, and acutely hazardous waste (California HSC §25117). CCR, Title 22, Division 4.5, Chapter 11, Section 66261.3 also defines hazardous waste.

Hazardous substances are defined more broadly in California HSC, Chapter 6.8, Section 25316 as being inclusive of hazardous materials, hazardous wastes, hazardous contaminants, and hazardous pollutants. In this section, the term “hazardous materials” is used to denote hazardous products and hazardous commodities that are transported or used in commerce. The term “hazardous waste” is used for waste materials that are destined for treatment or disposal and have been defined in state or federal regulations as being hazardous waste.

Exposure to hazardous materials can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials. If not properly handled or contained, hazardous materials also have the potential to be released into the environment and can cause public health and environmental concerns. Some hazardous materials are also fire and explosion hazards. For this reason, the storage, handling, transport, and disposal of hazardous materials is regulated by federal, state, and local governmental agencies (FEMA 2008).

5.8.1 Environmental Setting

Hazards Materials along Project Alignment

The proposed project would include the removal approximately 6 miles of existing overhead line and associated poles (TL666D), the reconfiguration of Line TL674A into an approximately 1.1-mile-long underground configuration, and the conversion of portions of existing overhead lines C510 and C738 also to underground configurations.

The proposed project would require the transport and use of unspecified quantities of hazardous materials such as fuels, lubricants, coolants, industrial gases (such as acetylene, argon, oxygen, and propane), and cleaning chemicals during construction. Table 5.8-1 provides an applicant-supplied general listing of the types of hazardous materials anticipated to be used during construction.

Table 5.8-1 Hazardous Materials Typically Used During Construction and Maintenance

Fuels and Fuel Additives	Vehicle Maintenance
Gasoline Diesel Propane (Compressed Gas) Diesel fuel additive Gasoline treatment Diesel de-icer Compressed oxygen Acetylene	Antifreeze (ethylene glycol) Batteries/Battery acid (in vehicles) Motor oil Automatic transmission fluid Brake fluid Starter fluid Two-cycle oil (contains distillates and hydro-treated heavy paraffinic) Chain lubricant (contains methylene chloride) Connector grease (penotox) Lubricating grease Puncture seal tire inflator Hydraulic fluid
Other Materials Used	
Methyl alcohol Ammonium hydroxide ZIP (1,1,1 trichloroethane) Eyeglass cleaner (contains methylene chloride) Hot stick cleaner (cloth treated with polydimethylsiloxane) Insecticide (1,1,1 trichloroethene carrier) Insulating oil (inhibited, non-polychlorinated biphenyl)	Canned spray paint Paint thinner Safety fuses Contact Cleaner 2000 (precision aerosol cleaner) WD-40 ZEP (safety solvent) ABC fire extinguisher Air tool oil Mastic coating

The operation and maintenance phase of the proposed project would also require the transportation and use of smaller quantities of these same hazardous materials. The applicant has indicated that storage or use of large quantities of any of these materials would not be required within the proposed project's rights-of-way.

These hazardous materials, if stored on the rights-of-way in sufficient quantity during construction or operation, would necessitate the applicant or its construction and maintenance contractors to maintain a Hazardous Materials Business Plan (HMBP), which is required by California regulations. The HMBP would include an inventory and quantity of all hazardous materials used during construction, operation and maintenance. HMBPs and associated regulations are further discussed in Section 5.8.2.

1 ~~Besides the insecticide,~~ None of the hazardous materials listed in Table 5.8-1 are acutely hazardous.
2 However, most are classified as toxic, flammable, or combustible. The transportation, storage, and use of
3 these hazardous materials could result in potential human and environmental exposures through
4 accidental spillage or release. The use, storage, transport, and disposal of hazardous materials used in
5 construction, operation, and maintenance of the proposed project would require that the applicant handle
6 the hazardous materials in accordance with federal, state, and county regulations. If insecticides or
7 herbicides are required during construction or operation, the applicant must only use those that are
8 registered with and approved by the U.S. Environmental Protection Agency (EPA).
9

10 The proposed project's pole removal and transmission line rerouting activities may also generate waste
11 materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls
12 (PCBs), ~~asbestos-insulation-containing materials~~, and universal waste materials. Additionally, planned
13 trenching activities could uncover contaminated soils and groundwater. These materials are designated by
14 the Resource Conservation and Recovery Act (RCRA) or the state of California as hazardous waste, as
15 would any spilled or discarded hazardous materials from Table 5.8-1.
16

17 **Physical Hazards**

18 Physical hazards along project utility corridors include fire, airport proximity, unexploded ordnance
19 possibly associated with former Marine Camp CJ Miller at the Del Mar Fairgrounds and Racetrack,
20 excavations, and objects that could induce current and voltage and result in electrical shock.
21

22 **Hazardous Waste and Substances Sites**

23 The applicant retained Environmental Data Resources, Inc. (EDR) to conduct a database analysis to
24 determine the location of hazardous wastes and hazardous material release sites within one mile of all
25 project components and work areas. This analysis involves database searches from local, state, and
26 federal agencies with varying levels of enforcement related to the generation, storage and handling,
27 transportation, and treatment of wastes, as well as emergency response activities and remediation of
28 contaminated soil and groundwater sites. This EDR *DataMap Corridor Study* report (Appendix F)
29 identifies 269 hazardous waste or hazardous material release sites within one mile of proposed project
30 components and work areas (EDR 2016).
31

32 In addition to EDR's search, the California Public Utilities Commission (CPUC) has conducted searches
33 of the State Water Resource Control Board's Geotracker database, Cease and Desist Orders, and Cleanup
34 and Abatement Orders list; California Environmental Protection Agency's list of highly hazardous solid
35 waste sites; and the California Department of Toxic Substance Control's (DTSC's) EnviroStor database
36 of hazardous waste facilities and sites. These sources are often collectively referred to as the "Cortese
37 List," and are listed in Government Code Section 65962.5. A search of the Cortese List databases found
38 10 sites within 0.25 miles of proposed project components (DTSC 2018; EDR 2016; SWRCB 2018).
39 Further details about these sites are included in Table 5.8-2; the location of each of these sites is presented
40 on Figure 5.8-1.
41

Table 5.8-2 Hazardous Materials and Potentially Contaminated Sites within 0.25 miles of Project

Name	Status/Site Type	Location	Distance from Project	Media/Contaminant
Del Mar Mobil Station	case closed (1992) LUST site	2750 Via De La Valle, Del Mar	100 ft. north TL6973	TPH contamination in soil and groundwater.
Rancho Car Wash	case closed (2010) LUST site	2661 Via De La Valle, Del Mar	400 ft. south TL6973	TPH contamination in soil and groundwater.
ARCO Station #1919/ PSI 704	case closed (2006) LUST site	660 Via De La Valle, Solana Beach	100 ft. west TL6973	TPH contamination in soil and groundwater.
Del Mar Texaco Station	case closed (2014) LUST site	2205 Via De La Valle, Del Mar	100 ft. north TL6973	TPH contamination in soil and groundwater.
Former Marine Camp C.J. Miller (on County Fairgrounds)	awaiting evaluation/ fmr. military base	2260 Jimmy Durante Blvd., Del Mar	adjacent TL666D	no record of contamination
Del Mar Thoroughbred Club (on County Fairgrounds)	case closed (2000) LUST site	2260 Jimmy Durante Blvd., Del Mar	500 ft. west TL666D	TPH contamination in soil and groundwater.
Agricultural Association – 22nd St District (on County Fairgrounds)	case closed (2000) LUST site	2260 Jimmy Durante Blvd, Del Mar	500 ft. NW TL666D	TPH contamination in soil.
San Dieguito Field / Del Mar Naval Auxiliary Air Facility Navy Dirigible Site	case closed (2012) fmr. military base	San Dieguito Rd. (Palm Dr NE), Del Mar	adjacent TL666D	TPH contamination in surface, groundwater and unspecified solid waste material
Precision Engine Controls Corp.	case closed in 2017	11661 Sorrento Valley Rd, San Diego	300 ft. west of southern terminus, TL666D	Chlorinated Hydrocarbons (TCE & PCE) contamination in groundwater and soil
Kyocera America Inc.	case closed (1993) soil contamination	11620 Sorrento Valley Rd, San Diego	700 ft. SW of southern terminus, TL666D	TPH contamination in soil.

Sources: EDR 2016; DTSC 2018; SWRCB 2018.

Key:

Bld. = Boulevard

Dr = Drive

ft. = feet

fmr. = former

LUST= Leaking Underground Storage Tank

mi.= miles

NE = northeast

NW = northwest

PCE= Tetrachloroethylene

Rd. = road

SW = southwest

TCE= Trichloroethylene

TPH = Total Petroleum Hydrocarbons



Sources: San Diego Gas and Electric (SDG&E) 2017;
Earth Systems Research Institute (ESRI) 2017

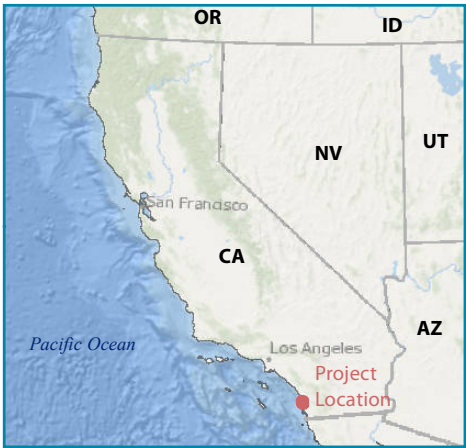
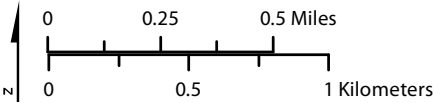


Figure 5.8-1
Hazardous Sites in
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California
February 2018



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Schools

Two public and six private schools, preschools, or day care centers are located within 0.25 miles of the proposed project, as shown in Table 5.8-3. Six of the eight schools would be located within 500 feet of the proposed project.

Table 5.8-3 Schools within 0.25 Miles of the Proposed Project

School	Address	Approximate Distance
Fusion Academy Solana Beach	512 Via De La Valle #201, Solana Beach	1,250 ft. west of western terminus, TL674A Reconfiguration
Therapeutic Literacy Learning Center	990 Highland Dr., Solana Beach	100 ft. west of western terminus, TL674A Reconfiguration
Del Mar Hills Elementary School ^(a)	14085 Mango Dr., Del Mar	adjacent TL666 Removal
Del Mar Hills Nursery School	13692 Mango Dr., Del Mar	within 100 ft. west of TL666 Removal
Del Mar Heights Elementary School ^(a)	13555 Boquita Dr., Del Mar	400 ft. west of TL666 Removal
Torrey Pines Montessori Preschool	2586 Carmel Valley Rd., Del Mar	within 100 ft. west of TL666 Removal
Brighter Future Preschool and Childhood Development Center	3422 Tripp Ct, San Diego	300 ft. southwest of TL666 Removal
After School Learning Tree	11525 Sorrento Valley Rd. #A, San Diego	1,000 ft. south of southern terminus, TL666D Removal

Sources: SanGIS 2016; Google 2018; Great Schools 2018

Note:

^(a) Public Schools

Key:

Dr. = Drive

Rd. = Road

Emergency Evacuation Routes

The San Diego County and State of California Offices of Emergency Services and the Federal Emergency Management Agency use hazard mitigation plans and area emergency plans to help prepare for situations that require emergency response. Based on the Unified San Diego County Emergency Services Organization, Operational Area Emergency Plan, Evacuation Annex Q, Interstate 5 (I-5), which is located in the project area, is a designated evacuation route (County of San Diego Office of Emergency Services 2014). The TL674 portion of the proposed project would include the installation of a new 69-kilovolt (kV) underground power line along Villa De La Valle where the road passes under an I-5 overpass and crosses I-5 on-ramps and off-ramps. The TL666D portion of the proposed project would include the removal of an existing 69-kV overhead power line, which currently crosses I-5 at a location 0.75 miles north of the Interstate 805 and I-5 junction.

Airports

The proposed project would not be located near any private or public airstrip. The closest private airstrip is the Marine Corps Air Station at Miramar, which is located 5 miles southeast of the southern terminus of TL666D portion of the proposed project. The nearest public airport is the Montgomery-Gibbs Executive Airport, which is located approximately 8 miles southeast of the southern terminus of TL666D portion of the proposed project. Torrey Pines Corporate Heliport Heliport, a private heliport, is located approximately 0.6 miles southwest of the southern terminus of TL666D portion of the proposed project (SanGIS 2016; Airport-Data.com 2018).

Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) identifies and maps areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors (CAL FIRE 2009a). CAL FIRE maps indicate that the project area is within a Local Responsibility Area, meaning local government is responsible for wildland fire protection. The City of San Diego Fire Department is responsible for most of the Local Responsibility Areas overlapping the proposed project area. The City of Del Mar is responsible for responding to fires within portions of the project area in the City of Del Mar. Most of the project area is designated Very High Fire Hazard Severity Zone, denoting a high susceptibility to wildland fire (City of San Diego 2009; CAL FIRE 2009b). The locations of these Very High Fire Hazard Severity Zones are presented in Figure 5.8-2. Fire protection services and equipment near the project alignment are discussed in detail in Section 5.14, “Public Services.”

5.8.2 Regulatory Setting

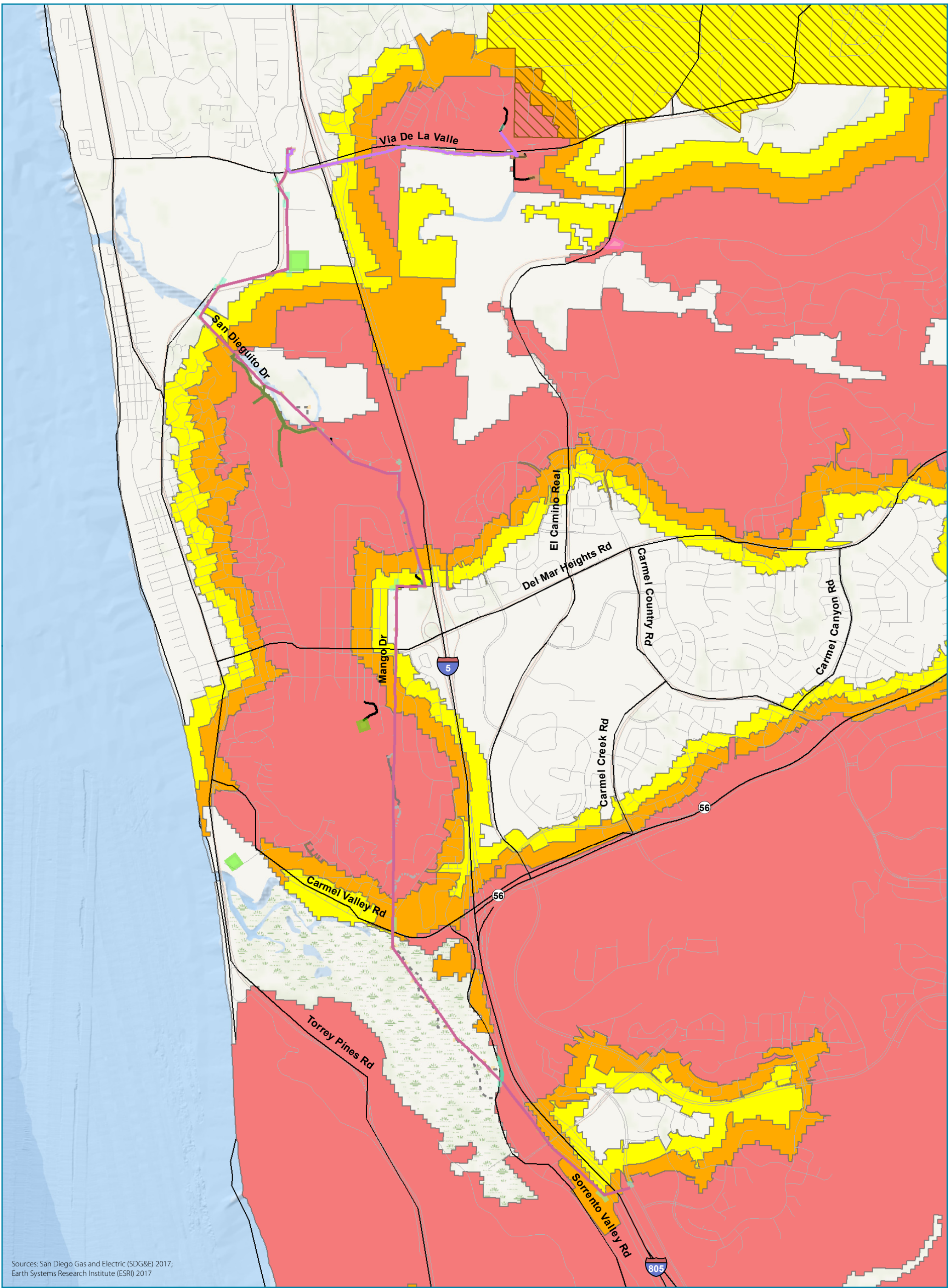
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Resource Conservation and Recovery Act

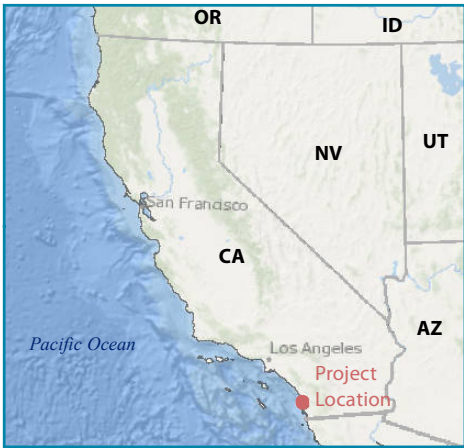
The RCRA regulates hazardous waste during all phases, from generation, to storage and transport, to treatment and final disposal. The EPA authorizes the California DTSC to administer the state’s RCRA programs. A RCRA hazardous waste exhibits at least one of four characteristics: ignitability (the ability to catch fire), corrosivity (ability to cause rust or destruction of a substance by chemical action), reactivity (ability to initiate an unstable and violent chemical change), or toxicity (ability to damage an organism). To keep track of hazardous waste activities, owners and operators of hazardous waste facilities must keep certain records and submit reports to the EPA at regular intervals. All facilities that generate, transport, recycle, treat, store, or dispose of hazardous waste are required to notify the EPA (or its state agency) of its hazardous waste activities. Any facility generating hazardous waste must obtain an EPA Identification Number unless the waste has been excluded or exempted from regulation. National Biennial RCRA Hazardous Waste Reports Sections 3002 and 3004 require that the EPA collect hazardous waste management information every two years from facilities that generate, treat, store, or dispose of hazardous waste. Used hazardous waste that would be generated from construction and operation of the proposed project is regulated under this act.

Hazardous Materials Transportation Act

The primary objective of the Hazardous Materials Transportation Act is to provide adequate protection against risks to life and property inherent in the transportation of hazardous materials in commerce. This act empowers the U.S. Department of Transportation to regulate the transportation of hazardous materials by rail, aircraft, vessel, or public highway. Hazardous materials regulations are subdivided by function into the following four areas within 49 Code of Federal Regulations (CFR) Parts 101, 106, 107, 171 to 177, and 178 to 180: Procedures and/or Policies, Material Designations, Packaging Requirements, and Operational Rules. The transportation of all hazardous materials to and from the project area during both construction and operation and maintenance would be regulated by this act.



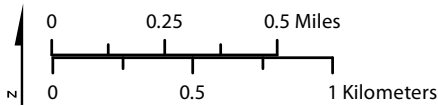
Sources: San Diego Gas and Electric (SDG&E) 2017;
Earth Systems Research Institute (ESRI) 2017



- | | |
|-----------------------------|---|
| Proposed Project Components | Existing Footpath |
| C510 Conversion | Existing Footpath/ATV Access |
| C738 Conversion | Temporary Footpath |
| TL666D Removal | Fire Hazard Severity Zones |
| TL674A Reconfiguration | Moderate |
| Drop Zone | High |
| Fly Yard | Very High |
| Staging Yard | Less than Very High severity, but no specific severity zone data has been adopted |
| Stringing Site | State Responsibility Area |
| Work Area | |
| Existing Access Road | |

*Unless noted all areas are Local Responsibility Areas

Figure 5.8-2
Fire Severity Zone around
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California
February 2018



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1 Oil Pollution Prevention

2 The objective of the oil pollution prevention regulation stated in 40 CFR Part 112 is to prevent oil
3 discharges from reaching navigable waters of the United States or adjoining shorelines. This regulation
4 was also written to ensure effective response to oil discharge. The regulation further requires that
5 proactive measures be used to prevent oil discharge through two specific requirements: the Spill
6 Prevention, Control, and Countermeasure [SPCC] rule and the Facility Response Plan requirement. A
7 facility is subject to SPCC regulations if the capacity of any single oil tank were greater than 660 gallons;
8 total oil storage capacity exceeded 1,320 gallons above ground or 42,000 gallons underground, and if, due
9 to its location, the facility could reasonably be expected to discharge oil into or upon the “Navigable
10 Waters” of the United States. The project would not be subject to the Facility Response Plan requirement.
11

12 Occupational Safety and Health Standards

13 The Occupational Safety and Health Standards (OSHA) (CFR Title 29) are regulations for safety in the
14 workplace and during construction, including safety regarding the use of helicopters during construction.
15 OSHA standards require implementation of a Hazard Communication Plan to identify and inventory all
16 hazardous materials and organize material safety data sheets. OSHA’s standards also require employee
17 training in safe handling of hazardous materials. OSHA standards are relevant to the proposed project
18 because its construction and operation would involve the use of vehicles that may pose health and safety
19 risks to workers. In addition, workers would handle and apply hazardous chemical substances during
20 construction and, to a lesser extent, during project operation and maintenance.
21

22 **State**

23 Hazardous Materials and Waste

24 California HSC Section 25501 defines a hazardous material as any material that, because of quantity,
25 concentration, or physical or chemical characteristics, poses a significant present or potential hazard to
26 human health and safety or to the environment. Hazardous materials include, but are not limited to,
27 hazardous substances, hazardous waste, and any material that a handler or the administering agency has a
28 reasonable basis for believing would be injurious to the health and safety of persons or harmful to the
29 environment if released into the workplace or the environment. CCR Title 8, Section 339 lists substances
30 identified as hazardous for which employers must provide material safety data sheets to employees.
31

32 CCR Title 22, Section 66261.1 identifies wastes that are subject to regulation as hazardous wastes and
33 that are subject to the notification requirements pursuant to the California HSC. The HSC defines a waste
34 as hazardous if it has any of the following characteristics: ignitability, corrosively, reactivity, and/or
35 toxicity. It also defines hazardous wastes listed pursuant to RCRA, non-RCRA hazardous wastes,
36 hazardous wastes from specific sources, extremely hazardous wastes, hazardous wastes of concern, and
37 special wastes. The EPA has authorized the California DTSC to administer the RCRA program in
38 California.
39

40 Under federal regulations, transformer oil, under most intended uses, would become used oil, the
41 recycling of which is regulated by 40 CFR 279. Use resulting in chemical or physical change or
42 contamination may also be subject to used oil regulation as a hazardous waste, which is also managed
43 under 40 CFR 279. In California, however, all used oil is managed as hazardous waste until tests have
44 shown that it is not hazardous (HSC Section 25250.4). Requirements for the transport of hazardous waste,

including driver training, are established in CCR Title 26 and would be applicable during any project-related activities that would involve transporting untested used oil.

Certified Unified Program Agency and Hazardous Materials Plans

Administration of the Certified Unified Program Agency (CUPA) is authorized by the California HSC (Chapter 6.11, Sections 25404-25404.8) and CCR Title 27, Division 1, Subdivision 4, Chapter 1, Sections 15100–15620. This program is implemented at the local level by government agencies certified by the secretary of the California EPA. The San Diego Department of Environmental Health’s Hazardous Materials Division (HMD) is the CUPA for the project area.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials regulated under the Business Plan Act include all hazardous materials that are stored or used at a facility.

California HSC Section 25503.5 requires that facilities that store hazardous materials in excess of 55 gallons (liquid), 500 pounds (solid), or 200 cubic feet (gas) prepare an emergency response business plan. Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to ~~project construction~~ hazardous materials being brought on site. In general, HMBPs describe and identify storage areas for hazardous materials and waste; describe appropriate handling, storage, and disposal techniques; and include measures for avoiding and addressing spills pursuant to California HSC Section 25504. The applicant would be required to submit an HMBP to the CUPA for both construction and operation phases of the proposed project.

Furthermore, California HSC Section 25510.3 requires notification to the school superintendent of any release of hazardous material that requires an emergency response to schools with 0.5 miles of the release.

Treated Wood Waste

Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with ~~pesticides~~ insecticides or other chemicals. ~~Because the chemical treatments could leach into water supplies after the disposal of the wood,~~ Section 25150.7 was developed to restrict how and where treated wood waste can be disposed of.

Hazardous Waste Control Act

The Hazardous Waste Control Act established the state hazardous waste management program, which is similar to, but more stringent than, RCRA program requirements. CCR Title 26 describes the requirements for the proper management of hazardous waste under the Hazardous Waste Control Act, including the following:

- Identification and classification;
- Generation and transportation;

- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for the identification, packaging, and disposal of such waste. Under the Hazardous Waste Control Act, and Title 26, the generator of hazardous waste must document waste from generation to disposal. Copies of this documentation must be filed with the California DTSC.

The California DTSC operates programs to protect California from exposure to hazardous wastes through the following practices and procedures:

- Handling of the aftermath of improper hazardous waste management by overseeing site cleanup;
- Prevention of the release of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly;
- Enforcement against those who fail to appropriately manage hazardous wastes;
- Exploration and promotion of measures to prevent pollution and encourage reuse and recycling;
- Evaluation of site-specific soil, water, and air samples and development of new analytical methods;
- Practice in other environmental sciences, including toxicology, risk assessment, and technology development; and
- Involvement of the public in the California DTSC's decision-making.

Hazardous wastes that may be encountered or generated during the construction and operation of the proposed project would be subject to the requirements defined by the Hazardous Waste Control Act.

Government Code Section 65962.5: Cortese List

The Cortese List includes all hazardous waste facilities subject to corrective action; land designated as hazardous waste property or border zone property; information received from the California DTSC about hazardous waste disposals on public land; sites listed pursuant to the California HSC Section 25356 (removal and remedial action sites); and sites included in the Abandoned Site Assessment Program. Pursuant to Government Code Section 65962.5, the California DTSC compiles and updates the Cortese List as appropriate, but at least annually. See Table 5.8-2 for a description of Cortese List hazardous materials and potentially contaminated sites within 0.25 miles of the project components.

California Occupational Health and Safety Administration

The California Occupational Health and Safety Administration (CalOSHA) is responsible for the development and enforcement of workplace safety standards and ensuring worker safety in the handling

1 and use of hazardous materials. Similar to the federal OSHA, CalOSHA promulgates requirements to
2 prevent worker exposure to certain types of hazardous substances in the workplace.

3
4 CalOSHA requires businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene
5 Plans. Its Hazards Communication Standard requires that workers be informed of the hazards associated
6 with the materials they handle. Manufacturers are required to label containers and provide material safety
7 data sheets and training to workers. The employer is required to monitor worker exposure to listed
8 hazardous substances and notify workers of exposure (8 CCR Sections 337–340). The regulations specify
9 requirements for employee training, availability of safety equipment, accident-prevention programs, and
10 hazardous substance exposure warnings.

11 12 Underground Service Alert (DigAlert)

13 California Government Code 4216 et seq. defines mandatory notification procedures for subsurface
14 excavations and installations. Pursuant to Section 4216 et seq., the applicant must contact the
15 Underground Service Alert of Southern California, also known as DigAlert, at least two working days but
16 no more than 14 days prior to conducting excavation activities for any proposed project component,
17 during both project construction and operation phases (DigAlert 2018).

18 19 **Local**

20 CPUC General Order 131-D, Section XIV.B

21 CPUC General Order 131-D, Section XIV.B, states that “local jurisdictions acting pursuant to local
22 authority are preempted from regulating electrical power line projects, distribution lines, substations or
23 electrical facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in
24 locating such projects, the public utilities shall consult with local agencies regarding land use matters.”

25 26 San Diego County Department of Environmental Health Hazardous Materials Division

27 The San Diego Department of Environmental Health’s HMD is the CUPA for the project area. The goal
28 of the HMD is to protect human health and the environment by ensuring that hazardous materials,
29 hazardous waste, medical waste, and underground storage tanks are properly managed. As the CUPA, the
30 HMD regulates facilities that handle or store hazardous materials or generate or treat hazardous wastes.
31 The HMD also manages the Emergency Response, Aboveground Petroleum Storage, and Underground
32 Storage Tank programs (HMD 2018).

33 34 San Diego County Fire Code and the 2017 County of San Diego Consolidated Fire Code

35 The County of San Diego has adopted fire codes that are more stringent than the state fire code. The
36 San Diego Fire Code addresses brush clearance, access roads, emergency access, maintenance of vacant
37 property, blasting, hazardous fire areas, use of spark arresters, open-flame equipment, and use of fire
38 roads and firebreaks. The County of San Diego Consolidated Fire Code is based on the County Fire Code
39 and has been adopted by San Diego County Fire Authority districts.

1 San Diego County Code of Regulatory Ordinances

2 Ordinances regarding hazardous material and hazardous waste are addressed in Title 6, Division 8,
3 Chapter 11 of the San Diego County Code of Regulatory Ordinances. These ordinances address
4 hazardous and medical wastes, underground storage of hazardous substances, hazardous materials
5 inventory and response plans, hazardous waste establishments (CUPA), and additional locally required
6 information on hazardous compressed gases, carcinogens, and reproductive toxins.

7
8 County of San Diego Operational Area Emergency Operations Plan

9 The County of San Diego Operational Area Emergency Operations Plan describes the emergency
10 management system within San Diego County and all jurisdictions within San Diego County. It provides
11 for a planned response to any emergency associated with natural disasters, technological or nuclear
12 incidents, or terrorism. It delineates operational concepts relating to various emergencies, identifies
13 components of a comprehensive emergency management system, and describes responsibilities for
14 protecting life and property and assuring the overall wellbeing of the population. The emergency
15 operation plan has 16 annexes which address components of the plan. Annex Q addresses evacuation and
16 evacuation routes (County of San Diego Office of Emergency Services 2014).

17
18 San Diego Air Pollution Control District

19 The SDAPCD enforces rules and regulations based on air pollution laws, educates businesses and
20 residents about their roles in protecting air quality, and implements air quality programs required by state
21 and federal mandates, such as the asbestos program. Asbestos is a Toxic Air Contaminant (as defined by
22 Title 17, California Code of Regulation, § 93000) and is used to manufacture transmission poles and
23 conductor. The SDAPCD regulates asbestos-containing materials from demolition and renovations of
24 regulated facilities. An asbestos notification form is required for any regulated demolition, whether or not
25 asbestos is present, and for certain regulated renovations. A Demolition Permit Release form is typically
26 required for all demolitions, including for facilities exempt from the National Emission Standards for
27 Hazardous Air Pollutants (DTSC 2006; SDAPCD 2018).

28
29 City of Del Mar Community Plan

30 The community plan for the city of Del Mar does not specifically address hazards in its environmental
31 section. The environmental section does address the protection of San Dieguito Lagoon and the flood
32 hazards associated with the San Dieguito Floodplain, across which the existing TL666D power line
33 extends. The community plan lists policies and recommendations intended to minimize land uses that
34 could threaten water quality and reduce the quantity and duration of pollutant discharge and runoff, which
35 could occur during construction of the proposed project (City of Del Mar 1976).

36
37 City of Del Mar Municipal Code

38 The City of Del Mar Municipal Code addresses fire codes and hazardous wastes, and guides the
39 implementation of the San Diego County Hazardous Waste Management Plan within the city of Del Mar.

1 City of San Diego General Plan

2 The Public Facilities, Services, and Safety Element of the City of San Diego General Plan outlines several
3 goals related to hazards. The plan describes Disaster Preparedness Goals with respect to planning, relief
4 services, and restoration following disaster events, as well as Fire-Rescue Goals for life, property, and the
5 environment in the event of a fire (City of San Diego 2015).

6
7 City of San Diego Community Plans

8 The communities of Torrey Pines, Torrey Hills, and Via De La Valle have published community plans
9 with policies that are relevant to the proposed project. The Torrey Pines Community Plan states that all
10 development within Torrey Pines must comply with the Uniform Fire Code and Section 6 (Brush
11 Management) of the City of San Diego's Landscape Technical Manual. In summary, these codes state that
12 brush or native vegetative growth on steep slopes must be controlled to protect existing and proposed
13 structures from fire hazards (City of San Diego 2014a). The Torrey Hill Community Plan encourages the
14 use of design features that promote fire protection, such as fire-resistant building materials and
15 landscaping (City of San Diego 2014b). The Via De La Valle Community Plan does not list goals or
16 policies related to hazards.

17
18 City of San Diego Municipal Code

19 Chapter 5, Article 5 of the City of San Diego Municipal Code outlines fire and hazardous materials codes.
20 Chapter 4, Article 2 Divisions 8 and 9 address hazardous waste and hazardous materials disclosure
21 requirements. The Municipal Code also describes a Brush Management Program to be maintained in
22 accordance with the City of San Diego's Landscape Technical Manual. Section 6 of the Brush
23 Management Program requires the control of native vegetative growth on steep slopes to protect
24 structures from fire hazards.

25
26 **5.8.3 Environmental Impacts and Assessment**

27
28 **Applicant Proposed Measures**

29 The applicant has not incorporated any formal applicant-proposed measures (APMs) into the proposed
30 project that would minimize or avoid impacts from hazards or hazardous materials. However, the
31 applicant would adhere to best management practices (BMPs) related to hazardous materials outlined in
32 the applicant's *Water Quality Construction BMP Manual* (Appendix F), and BMP for wildland fire
33 hazards as addressed in Operations and Maintenance Wildland Fire Prevention Plan (Appendix F).
34 Additionally, the applicant has agreed to implement APM TRA-01 to coordinate with emergency service
35 providers related to the potential for and scheduling of lane or roadway closures that during construction
36 that could affect emergency service provider access and circulation on the local street network. See
37 Section 5.16, "Traffic and Transportation" for additional information.

Significance Criteria

Table 5.8-4 includes the significance criteria from Appendix G of the CEQA Guidelines for hazards and hazardous materials. This checklist is used to evaluate the environmental impacts of the proposed project related to hazards and hazardous materials.

Table 5.8-4 Hazards and Hazardous Materials Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Small amounts of the hazardous materials listed in Table 5.8-1 would be used, transported, and stored in the project area during the proposed project's 12-month construction period. Refueling of equipment and vehicles would take place at staging areas or fly yards. The proposed pole removal and transmission line rerouting activities may generate hazardous waste materials such as chemically treated wood, petroleum-

based transformer oil, PCB-contaminated materials, and asbestos-containing materials. Additionally, soil excavation would be required during trenching and the installation of duct banks, vaults, poles, and guard structures. These activities could uncover contaminated soils and groundwater. Materials that are excavated, transported, stored, or disposed of during construction of the proposed project have the potential to contain hazardous compounds and could present a hazard to construction workers, the public, or the environment if improperly managed.

According to the applicant, management practices documented in the applicant's *Water Quality Construction BMP Manual* (BMP Manual; Appendix F) would be implemented during construction to reduce potential impacts from hazardous materials. Practices include the following:

- All non-hazardous materials encountered during excavation activities would be transported to a landfill;
- Contaminated soil and hazardous materials, if encountered, would be transported to an appropriately permitted, approved disposal facility;
- All spills would be immediately cleaned up and disposed of in accordance with the applicant's BMP Manual;
- Uncontaminated groundwater encountered during excavation activities would be handled following procedures described in the BMP Manual;
- Contaminated and potentially contaminated groundwater, if encountered during excavations, would be handled by a qualified field environmental representative; and
- A Safety and Environmental Awareness Program would be developed and implemented, which will include training on hazardous material protocols and BMPs.

In addition to implementing BMPs, the applicant would comply with all applicable regulations pertaining to the management of hazardous materials and hazardous wastes. For example, removal or relocation of utility lines with components suspected to contain asbestos may requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M). With adherence to applicable laws and regulations, implementation of the applicant's BMP Manual, and Safety and Environmental Awareness Program training, impacts resulting from the routine transport, use, or disposal of hazardous materials would be reduced, but these adherences are not comprehensive enough to mitigate all potential impacts.

San Diego Gas & Electric Company (SDG&E) or its contractors would remove an oil circuit breaker from the Del Mar Substation and take it to an existing yard. As applicable, parts would be separated to serve as emergency replacement components for other equipment currently in service. The remaining parts would then be sent to a local contracted metal scrap company for disposal. SDG&E's best management practices would be implemented, as applicable, during this work phase.

To reduce this impact to less than significant, the applicant shall implement **MM HAZ-1**, which would require the applicant develop and implement a Hazardous Materials and Waste Management Plan and Emergency Spill and Evacuation Training for those working onsite/in the field on the proposed project. This plan would require training of construction crews in safe handling of hazardous materials prior to the initiation of construction activities and include the documentation of all relevant hazardous materials and waste management protocols and BMPs. **MM HAZ-1** would require the testing of any soils suspected of contamination.

MM HAZ-1: Hazardous Materials Waste Management Plan / Emergency Spill and Evacuation Training. Prior to construction, the applicant shall prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. The plan shall include the following requirements and procedures:

1. The Worker Training Program (see **MM BR-3**) would include training requirements for construction workers such as in appropriate work practices, including and spill prevention and response measures. Additional training for those performing excavation activities shall be required and shall include training on types of contamination and contaminants (e.g., petroleum hydrocarbons, asbestos, and hazardous materials as defined by the California HSC) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Training would also entail safe evacuation, which could be required due to an unanticipated major spill or other emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the affected work site and specified, approved evacuation route(s) in case of emergency. This training may be carried out as a stand-alone training module or in conjunction with the training required in **MM BR-3**.
2. Containment of all hazardous materials at work sites and properly dispose of all such materials.
 - a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather and further contamination.
 - b. Fuels and lubricants shall be stored only at designated staging areas.
3. Maintenance of hazardous material spill kits for small spills at all active work sites and staging areas. Thoroughly clean all spills as soon as they occur. If an accidental spill or fluid leak occurs at any time during project construction, including in locations within 50 feet of aquatic resources in unanticipated circumstances such as equipment malfunction, secondary containment strategies may be utilized to contain the spill.
4. Storing sorbent and barrier materials at all construction staging areas, including staging areas used during activities for decommissioning. Sorbent and barrier materials will be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials.
5. Performing all routine equipment maintenance at a shop or at the staging area and recovering and disposing of wastes in an appropriate manner.
6. Monitoring and removal of vehicles used for construction-related activities with chronic or continuous leaks from use and complete repairs before returning them to operation.

7. Storing shovels and drums at the staging areas. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material. Only trained construction workers shall handle hazardous, and potentially hazardous, materials.
8. Transporting, shipping, and disposal procedures for hazardous waste.
9. Identification of a qualified field environmental representative for the proposed project for management of hazardous materials, hazardous wastes, contaminated soil, and contaminated groundwater.
10. Procedures for notifying applicant and agency personnel in the event of discovery of contaminated soil and/or groundwater. Contact information for federal, regional, and local agencies; the applicant's field environmental representative and environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers.

This plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.

The majority of the chemicals used for operation and maintenance activities would be similar to those used during the construction phase, and the daily use of such chemicals would generally be considerably less during operation and maintenance activities relative to construction activities. Through implementation of **MM HAZ-1**, potential impacts associated with hazardous materials management would be reduced to less than significant.

Significance: Less than Significant with Mitigation Incorporation

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?

As discussed under impact criterion (a), the applicant would transport, use, or dispose of hazardous materials and petroleum products in accordance with the applicant's BMPs and all applicable federal, state, and local regulations. Accidental releases or spills could still occur, representing a potential hazard to the public and environment during construction and could be a significant impact. Compliance with **MM HAZ-1** would reduce impacts to a less than significant level.

Other potential hazards associated with proposed project include the presence of high voltage, open-air conductors that can create a high-temperature electrical arc between the electrical conductor and persons or objects. Prior to removing existing conductor and installing new overhead conductor, SDG&E would install temporary guard structures at road crossings and other locations where the existing or new conductor could come in contact with existing electrical and communication facilities, or with vehicular and/or pedestrian traffic if the line were to accidentally fall during stringing operations. Further, the applicant's power lines possess grounding devices, and, in the event of a lightning strike on a power line,

the strike would be discharged to appropriate ground. However, impacts would be significant if workers were not informed of proper safety procedures. All workers would be trained in appropriate safety procedures, as described in **MM HAZ-1** and impacts to construction crew and the environment relating to accidental release or exposure to hazardous materials would be less than significant with implementation of **MM HAZ-1**.

Accidental contact with existing underground utility lines or a private utility line, such as a leach line associated with a septic system, could release waste materials and pose a safety risk for the public and workers. Compliance with California Government Code 4216.1 would reduce potential impacts to public utility lines because underground utilities would be identified and marked prior to construction so that they could be avoided. The potential for the proposed project to damage existing underground infrastructure would be less than significant.

After the removal of approximately 6 miles of existing overhead conductor associated with the TL666D, removal of TL674A and its reconfiguration, and the conversion of C510 and C738, operation and maintenance requirements in the project area would be reduced. Moreover, new project components would be installed in areas where similar operation and maintenance activities already occur. Therefore, no new or additional impacts relating to hazards are anticipated from the project's operation and maintenance activities. The majority of the chemicals used for operation and maintenance activities would be similar to those used during the construction phase, and the daily use of such chemicals would generally be considerably less during operation and maintenance activities relative to construction activities. Consequently, the less frequent use of hazardous materials within the project alignment would result in much lower likelihood of a significant upset or accident. Therefore, no new or significant impacts would result from reasonably foreseeable upset or accident conditions during operation and maintenance of the proposed project.

Significance: Less than Significant with Mitigation Incorporation

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?

Schools within 0.25 miles of the proposed project are considered sensitive receptors. As previously discussed, two public and six private schools, preschools, and day care centers were identified within 0.25 miles of the proposed project (Table 5.8-3). Six of the eight schools would be located within 500 feet of project work areas. As discussed under impact criteria (a) and (b), the impacts associated with the proposed project's materials, substances, or waste would be less than significant with the implementation of applicant-proposed BMPs, **MM-HAZ-1**, and compliance with applicable hazardous material regulations. Due to the temporary and short-term nature of construction and the relatively small quantity of hazardous materials to be used and stored during construction, impacts to schools from potential hazardous substance releases or emissions would be less than significant with mitigation.

After the removal of TL666D, operation and maintenance requirements in the project area would be reduced when compared to operation and maintenance requirements on the existing overhead utility infrastructure lines and new project components would be installed in areas where similar maintenance activities already occur. The majority of the chemicals used for operation and maintenance activities would be similar to those used during the construction phase, and the daily use of such chemicals would generally be considerably less during operation and maintenance activities relative to construction activities. Consequently, the less frequent use of hazardous materials within proposed project alignment would result in much lower likelihood of a significant upset or accident. The applicant also has BMPs for hazardous materials release responses, which comply with federal, state, and local regulations for any release of hazardous materials. The compliance with **MM-HAZ-1**, BMPs and regulations would additionally render any hazardous materials upset or accident less than significant.

Significance: Less than Significant with Mitigation Incorporation

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?

The project components and work areas would not overlay any areas included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Ten hazardous-materials-contaminated sites are located within 0.25 miles of the project area, described in Table 5.8-2.

The closest hazardous material sites to the excavation area are four leaking underground storage tank sites located within 100 feet of the proposed project. Since the soil and groundwater at these sites are contaminated with petroleum hydrocarbons, the potential exists for contaminants to migrate to the project area. Ground-disturbing activities associated with trenching for the proposed project could potentially uncover and release petroleum-hydrocarbon-contaminated soil and groundwater, which would be a significant impact. As indicated previously, **MM HAZ-1** would require the applicant to prepare and implement a Hazardous Materials Management Plan to ensure that specific actions and protocols regarding contaminated soil and groundwater are established. Through implementation of **MM HAZ-1**, potential impacts associated with undiscovered soil contamination would be less than significant.

No project operation and maintenance areas would be located on areas included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. There are four contaminated sites within 0.25 miles of the proposed project's operation and maintenance areas (i.e., component TL6973). However, operation and maintenance activities for the proposed project would not typically involve new areas of ground disturbance. Since the four closest sites are all underground, it is unlikely that routine operation and maintenance activities would result in contact with these contaminated sites. Therefore, there would be no impact from operation and maintenance under this criterion.

Significance: Less than Significant with Mitigation Incorporation

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 for people residing or working in the project area?

The proposed project would not be located within 2 miles of a public airport, and thus would not affect or disrupt existing operations or worker safety at such a facility.

Significance: No Impact

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?

The proposed project would not be located within 2 miles of a private airstrip. However, the TL666D component of the proposed project would be located 0.6 miles from a private heliport. The project would not affect or disrupt existing operations or worker safety at such a facility. Therefore, no impact would occur.

Significance: No Impact

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

I-5, a county-designated evacuation route, is located in the project area. A new 69-kV underground power line would be installed along Villa De La Valle where the road passes under an I-5 overpass. The new line would also be installed across two I-5 on-ramps and one I-5 off-ramp. In addition, the proposed project would involve the removal of an existing 69-kV overhead power line, which currently crosses I-5 0.75 miles north of the Interstate 805 and I-5 junction. Activities along Villa De La Valle would require temporary lane closures, which could interfere with entrance and exits to I-5 at Villa De La Valle. The removal activities associated with the 69-kV line could require temporary I-5 lane closures and could impact the I-5 evacuation route.

Portions of the TL674A reconfiguration, TL666D removal, and C510 conversion activities would be conducted within public roadways and would cross public roadways. Temporary lane and road closures may be required in locations where the proposed project would span or be adjacent to public roadways. Some lanes or roads may be temporarily limited to one-way traffic at times, and one-way traffic controls would be implemented as required.

A Del Mar Fire Department fire station is located on Jimmy Durante Boulevard at the Del Mar fairgrounds. This fire station is situated adjacent to the project's TL666D component where the removal of a 69-kV line would potentially require a road closure or work along road shoulders that could temporarily affect normal roadway operations. A road closure on Jimmy Durante Boulevard could impair the fire department's ability to respond to an emergency.

To address the potential for road closures and obstructions to emergency vehicle circulation, SDG&E has agreed to implement **APM TRA-01**. At least 30 days prior to construction of the proposed project, SDG&E would coordinate with the Del Mar Fire Department and the San Diego County Sheriff's Department to inform them of the planned lane closures along Jimmy Durante Boulevard and to minimize

potential disruptions to emergency vehicle response times. Coordination with emergency service providers would inform the likely period of construction and develop protocols to reduce potential conflicts between construction vehicles and emergency vehicles accessing affected roadways.

Moreover, all lane and road closures, and road encroachments would also require SDG&E to apply for permits from and submit traffic management plans to the appropriate agencies. Permits could require crews to work along certain portions of roadway (i.e., Via de la Valle) during certain hours, or to stage machinery and equipment in such a manner as to retain access and maintain traffic flow to extent feasible during construction. Road closures and encroachment into public roadways, including I-5, could impair implementation or interfere with adopted emergency response or emergency evacuation plans. However, SDG&E would be required to obtain an encroachment permit and road crossing approvals for the work and implement permit conditions, which may include special guard structure procedures, traffic control, netting, as directed by the California Department of Transportation. Based on the temporary nature of project construction and the requirement to implement traffic control measures as conditioned in required encroachment permits, the proposed project would not conflict with emergency evacuation or response plans. As a result, potential impacts during construction would be less than significant.

Operation and maintenance activities for the proposed project would be conducted in the same manner as they were prior to construction. The removal of overhead transmission lines over and along Jimmy Durante Boulevard and over I-5 would eliminate all future operation and maintenance activities associated with those transmission lines. Since there would be no operation and maintenance activities on Jimmy Durante Boulevard or over I-5, there would be no road or lane closures. The new underground transmission lines that cross I-5 on and off-ramps would require little maintenance and no road closures. Since there would be no road or lane closures associated with I-5 or Jimmy Durante Boulevard during operation and maintenance activities, the proposed project would not conflict with emergency evacuation or response plans. As a result, there are no impacts associated with operation and maintenance of the proposed project under this criterion.

Significance: Less than Significant

h. 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?

The majority of the proposed project would be located within Very High Fire Hazard Severity Zones. Construction activities could pose fire risk due to the increased presence of vehicles, equipment using combustible engines, and human activity. A construction-caused fire could spread to residential or wildland areas near the project alignment, creating a significant risk of property loss and injury or death. The risk of such a wildfire would be a significant impact.

No APMs are proposed to minimize or avoid impacts from wildland fires caused by the proposed project because the applicant has committed to implementing its existing *Operations and Maintenance Wildland Fire Prevention Plan*, which is in Appendix F. The plan requires the assessment of work areas for wildland fire risk and reduction of fire hazards inside and around the perimeter of each work area when possible. The plan prohibits vehicles and equipment from being staged or parked on vegetation.

Vegetation identified as a fire hazard would be cleared and removed or chipped and spread on site. Cleared vegetation would be disposed of in accordance with instructions from applicable jurisdictional agencies and/or landowners. Additionally, the applicant would comply with San Diego fire codes, which require specific actions to mitigate the potential for a wildland fire. Through compliance with fire code requirements and implementation of existing plans, the potential impacts associated with wildland fire would be less than significant during construction.

The proposed project would require the removal of approximately 6 miles of existing 69-kV overhead power lines, and the removal of approximately 0.85 miles of existing 12-kV overhead power lines, which would eliminate all future operation and maintenance activities and fire risk associated with these overhead transmission lines. In addition, the applicant would implement its *Operations and Maintenance Wildland Fire Prevention Plan* and comply with all applicable fire codes during the operation and maintenance phase. With the removal of existing overhead transmission lines, the reduction in flammable materials, the adherence to a wildland fire plan, and compliance with fire codes, the potential for wildland fire from the operation and maintenance of the proposed project would be reduced, and no new impacts would occur. Therefore, operation and maintenance of the proposed project would result in no impact under this criterion.

Significance: Less than Significant

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5.9 Hydrology and Water Quality

5.9.1 Environmental Setting

Regional Setting

Components of the proposed project would be constructed within or would cross sections of southern Del Mar and northwestern San Diego, California, as discussed in ~~Section~~ Chapter 4.0, “Project Description” and shown in Figure 4-1 Project Location Map. The proposed project would be located entirely within the Del Mar and La Jolla U.S. Geological Survey (USGS) 7.5-minute quadrangles (USGS 2017). It would be located within the Peninsular Range, entirely within the coastal zone, at elevations ranging from approximately 400 feet above mean sea level to approximately mean sea level. The entirety of the proposed project would be located within the San Diego Subregion of the South Coast Hydrologic Region of California (SDG&E 2017; DWR 2003), otherwise referred to as Region 9 by the Regional Water Quality Control Board (RWQCB), in the San Diego Watershed (DWR 2016). Average annual precipitation in the coastal San Diego region ranges from 10 to 13 inches, primarily received between November and February. Precipitation flows from higher elevations in the east toward and into the Pacific Ocean in the west.

The proposed project would cross the San Dieguito Hydrologic Unit (HU), known as HU 905.00, and the Peñasquitos Hydrologic Unit, HU 906.00 (RWQCB 2016). It would also cross the Solana Beach Hydrologic Area (HA), known as HA 905.10, and the Rancho Santa Fe Hydrologic Subarea (HSA), known as HSA 905.11, both of which are located within the San Dieguito HU, which encompasses approximately 346 square miles within west-central San Diego County, and includes portions of both Del Mar and Escondido. The Miramar Reservoir Hydrologic Area, known as HA 906.10, is located within the Peñasquitos HU, encompassing approximately 170 square miles in west-central San Diego County. The proposed project would also cross several major aquatic features, including the San Dieguito River, San Dieguito Lagoon, and Los Peñasquitos Marsh (SDG&E 2017). The San Dieguito HU discharges primarily into the San Dieguito River, and the Peñasquitos HU discharges primarily into Los Peñasquitos Lagoon and Mission Bay, all of which discharge into the Pacific Ocean. For a map of HUs, HAs, and HSAs associated with the proposed project, see Figure 5.9-1.

Groundwater

The San Dieguito Creek Groundwater Basin (Basin 9-12) underlies approximately 2 miles of the project alignment (DWR 2016). This basin is characterized as “very low priority” by the California Statewide Groundwater Elevation Monitoring program (DWR 2014). Coastal groundwater basins in RWQCB 9 are often subject to inundation and intrusion of saline water and, in San Diego County, are also prone to high levels of calcium and sodium cations and bicarbonate and sulfate anions (DWR 2003). The San Dieguito Creek Groundwater Basin is composed of Quaternary alluvium (recent sand, gravel, silt, and clay deposits), totaling an area of approximately 6 square miles. The basin is drained by the San Dieguito River and has a storage capacity of approximately 63,000 acre-feet. It is associated with a high groundwater table and substantial ponding (DWR 1975). The basin is naturally recharged by (from greatest to least percentage) the percolation of flow from the San Dieguito River, precipitation from higher to lower elevations within the valley, underflow under Lake Hodges, overflow through sediments, and return flow from irrigation use (SDG&E 2017).

The cities of San Diego and Del Mar primarily use treated, potable water purchased and imported by the San Diego County Water Authority via aqueducts from the Colorado River and Northern California (SDG&E 2017). Additionally, the city of San Diego uses local surface and groundwater sources, including multiple reservoirs and the San Vicente Production well in the Santee-El Monte Basin (9-15) (SDCWA 2016). The Santee and El Monte HSAs are within the Lower San Diego HA, in the San Diego HU. No portions of the project alignment are located within the San Diego HU.

Surface Water

The proposed project would cross multiple surface waterbodies and aquatic features, as described in Table 5.9-1. Under Section 303(d) of the Clean Water Act (CWA), states identify waterbodies as “impaired” if they contain certain pollutants in concentrations such that the waterbody no longer meets water quality standards (EPA 2017). The San Dieguito River/Lagoon, Los Peñasquitos Lagoon, and Peñasquitos Creek are all defined as Category 5 waterbodies according to the 2014 State Water Resources Control Board (SWRCB) list of 303(d) water quality segments in California. Category 5 waterbodies are segments of waterbodies where CWA standards are not met, and a Total Maximum Daily Load (TMDL) is required (see Section 5.9.2, “Regulatory Setting”), but not yet completed, for at least one of the pollutants being listed for the segment (SWRCB 2014). Pollutants associated with National Hydrology Dataset-named waterbodies crossed by or adjacent to the proposed project are described in Table 5.9-1.

Table 5.9-1 Named Waterbodies Crossed by or Adjacent to the Project, and Associated Pollutants

Waterbody Name	Distance from Proposed Project	Pollutants in Waterbodies
San Dieguito River	Crossed	Nitrogen Phosphorus Total Dissolved Solids Toxicity
San Dieguito Lagoon ^(a)	Crossed	See San Dieguito River
Los Peñasquitos Lagoon	Crossed	Sedimentation/Siltation
Peñasquitos Creek	0.3 miles	Phosphate Total Dissolved Solids Toxicity

Sources: USGS 2018; SWRCB 2014

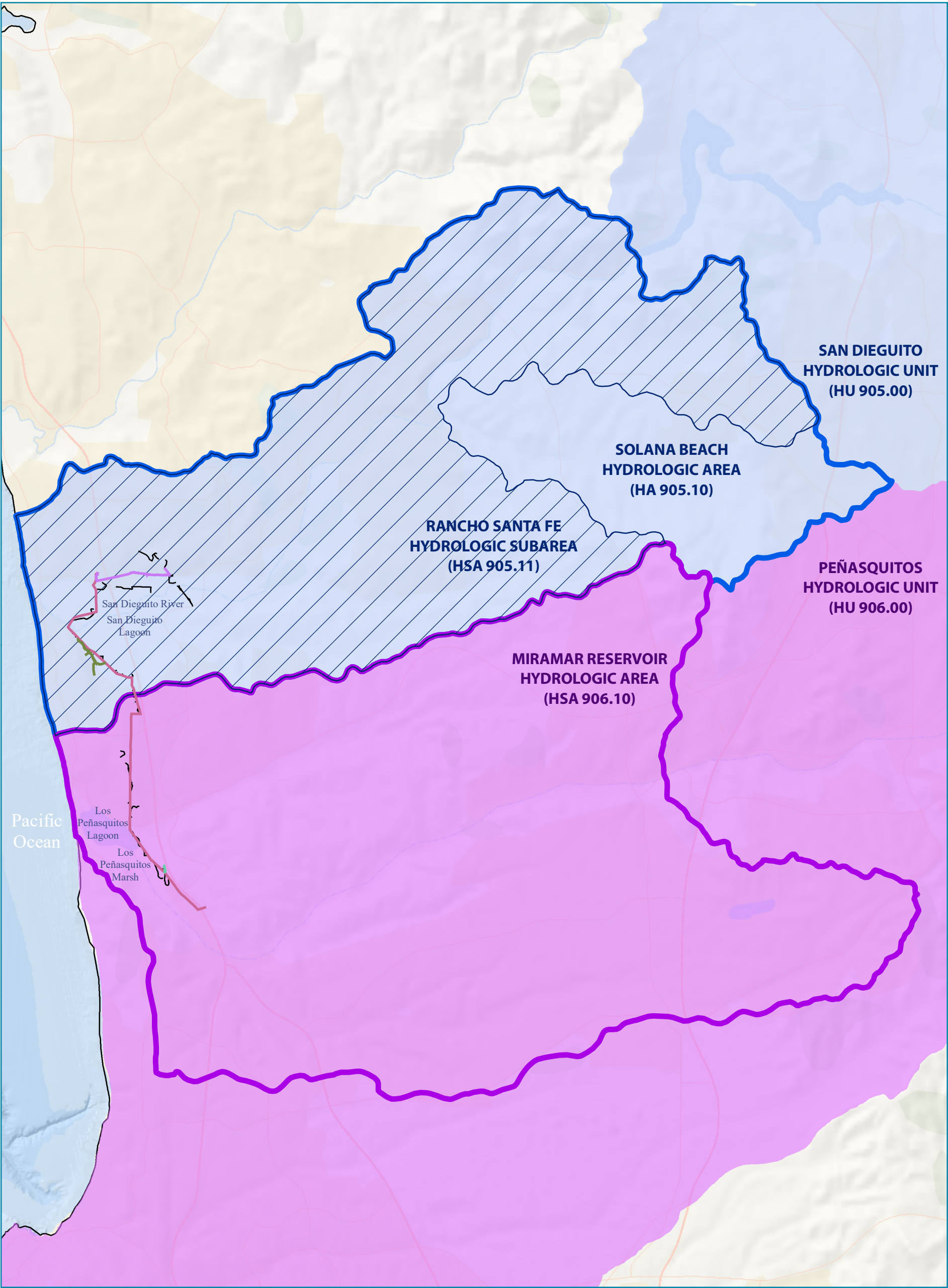
Note:

^(a) The San Dieguito River and San Dieguito Lagoon are considered separate waterbodies for the purposes of this analysis, but are grouped together on the CWA 303(d) list

Flood, Tsunami, Mudslide, and Seiche Risk

The Federal Emergency Management Agency (FEMA) identifies Special Flood Hazard Areas (SFHAs), or floodplains at risk of flooding, on the Flood Insurance Rate Map. The following SFHA zones would be crossed by portions of the proposed project (FEMA 2012):

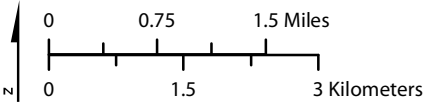
- **Zone A:** Area with a 1 percent annual chance of flooding and a 26 percent chance of flooding over the life of a 30-year mortgage. No depths or Base Flood Elevations have been determined for these areas.
- **Zone AE:** Area of high flood risk where the Base Flood Elevations have been determined.
- **Zone X:** Area of moderate to low flood hazard minimally located outside the 100-year floodplain and, in some cases, outside the 500-year floodplain (FEMA 2012).



- | | |
|---|------------------------------------|
| Hydrologic Subareas | Proposed Project Components |
| Rancho Santa Fe Hydrologic Subarea (HSA 905.11) | C510 Conversion |
| Hydrologic Areas | C738 Conversion |
| Miramar Reservoir Hydrologic Area (HA 906.10) | TL666D Removal |
| Solana Beach Hydrologic Area (HA 905.10) | TL674A Reconfiguration |
| Hydrologic Units | Access Roads |
| Peñasquitos Hydrologic Unit (HU 906.00) | |
| San Dieguito Hydrologic Unit (HU 905.00) | |

Sources: Calwater 2004; San Diego Gas and Electric (SDG&E) 2018; Earth Systems Research Institute (ESRI) 2018

Figure 5.9-1
Hydrologic Units, Areas, and
Subareas Crossed by the
Proposed Project Alignment
San Diego County, California
June 2018



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The proposed project would cross Zone A and Zone AE SFHAs along the San Dieguito River, through San Dieguito Lagoon, and through Los Peñasquitos Lagoon, and Zone X SFHAs along the fringes of the lagoons. Portions of both lagoons are Regulatory Floodways, which are federally determined and community-regulated waterbodies and adjacent land areas that are reserved for the purpose of discharging base floods without simultaneously increasing the surface water level (FEMA 2012, 2017). Additionally, as identified by the California Governor's Office of Emergency Services, the proposed project would be located within Dam Failure Inundation Areas for three dams, all of which present Extremely High downstream hazards (SDG&E 2017; DWR 2017). The Lake Sutherland Dam drains to Santa Ysabel Creek, which is a tributary to the San Dieguito River (San Dieguito River Park Joint Powers Authority 2002). The lake is upstream of the Lake Hodges Dam, which is a large dam on the San Dieguito River. The Miramar Reservoir is bounded by the Miramar Reservoir Dam and contains water that originates from the Colorado River Aqueduct and the California Aqueduct. In the event of inundation, the Miramar Reservoir would drain through Los Peñasquitos Lagoon (City of San Diego 2018; CSDOES and SDCUDC 2010).

The San Dieguito River is also considered a flood hazard area that would be subject to floods associated with dam inundation. The flood hazard area along the San Dieguito River extends from the Lake Sutherland Dam approximately 25 miles northeast of the project alignment through Lake Hodges and the San Dieguito River to the Pacific Ocean (DWR 1964).

A tsunami is a long oceanic wave generally resulting from geologic shifts on the ocean floor, such as earthquakes (CSDOES 2017). Seismic events as far away as Japan and Chile can produce local tsunamis in Southern California. The San Dieguito and Los Peñasquitos Lagoons are both within the Tsunami Emergency Response Planning Zone (Cal OES 2015). Portions of the proposed project would pass through these hazard zones.

A mudslide is a type of landslide that can occur naturally result from human activities such as the removal of stabilizing vegetation or slopes. The San Diego County Multi-jurisdictional Hazard Mitigation Plan and the USGS map regional and national landslide susceptibility, respectively. No proposed project components would traverse areas of high landslide risk, the eastern terminus of the proposed project is located near a landslide-prone area (CSDOES and SDCUDC 2010), and USGS maps the entire project alignment as having low landslide susceptibility (USGS 2001).

An aquatic resources assessment was conducted by RECON Environmental, Inc., in 2013 to identify the boundaries, types, and acreages of aquatic resources within the proposed project alignment that could potentially fall under U.S. Army Corps of Engineers (USACE), RWQCB, California Department of Fish and Wildlife (CDFW), and/or California Coastal Commission (CCC) jurisdiction (AECOM 2017). During the assessment, 34 hydrologic features were identified, 28 of which were determined likely to fall under USACE, CDFW, RWQCB, and/or CCC jurisdiction. Identified hydrologic features include drainages, scours, and estuaries and associated estuarine components (tidal inlets, salt pan, and perennial marshlands).

In the city of San Diego, drinking water is primarily sourced from Northern California, the Colorado River, and local rainwater runoff stored in reservoirs (City of San Diego 2018). The closest reservoirs to

the proposed project would be Lake Hodges and Miramar Reservoir, both of which are approximately 7 miles east and upstream of the proposed project alignment.

5.9.2 Regulatory Setting

Federal

The Clean Water Act (Title 33, § 1251 et. seq. of the U.S. Code)

The 1972 Federal Water Pollution Control Act and its 1977 amendments, collectively known as the CWA, established national water quality goals and the basic structure for regulating discharges of pollutants into the waters of the United States.

Under section 303(d) of the CWA, states, territories, and authorized tribes are required to develop lists of impaired waters (i.e., waters that exceed applicable water quality standards), establish priority rankings for waters on the lists, and develop TMDLs for these waters. A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. The SWRCB and RWQCBs are engaged in ongoing efforts to monitor and assess water quality, prepare the Section 303(d) list, and develop TMDL requirements. Waters within the project alignment on the Section 303(d) list are shown in Table 5.9-1.

Section 401 of the CWA requires that every applicant for a federal permit or license for any activity that may result in discharge to a water body obtain State Water Quality Certification that the proposed activity would comply with state water quality standards. In California, 401 Certification is granted by one of the RWQCBs for projects that are located in a single region.

As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (Order 2009-0009-DWQ [as amended by 2010-0014-DWQ and 2012-0006-DWQ]). The Construction General Permit covers a variety of construction activities that would disturb 1 or more acres of soil and could result in wastewater discharges. The Construction General Permit process requires the permit applicant to submit a Notice of Intent to the SWRCB, develop a Stormwater Pollution Prevention Plan (SWPPP), and monitor water quality. Wetlands, drainages, creeks, and streams are generally subject to the jurisdiction of the USACE under Section 404 of the CWA. By USACE definition, all aquatic or riverine habitats between the “ordinary high water mark” of rivers, creeks, and streams are potentially considered “waters of the United States” and may fall under USACE jurisdiction. Any deposit of fill into waters of the United States, including wetlands, requires the acquisition of a permit from the USACE pursuant to Section 404 of the CWA (EPA 1977).

Rivers and Harbors Appropriation Act Section 10

Section 10 of the Rivers and Harbors Appropriation Act of 1899 (33 United States Code [U.S.C.] § 403 et seq.) requires that regulated activities conducted below the ordinary high water mark of navigable waters of the United States require a Section 10 permit and approval by the USACE. Activities include the placement/removal of structures or work involving dredging, disposal of dredged material, filling,

excavation, or any other disturbance of soils/sediments or modification of a navigable waterway (EPA 2016).

National Flood Insurance Program

The National Flood Insurance Program (NFIP) of 1968, administered by FEMA, provides a federal program for participating communities to purchase flood insurance. Participation in the NFIP is based on an agreement between local communities and the federal government, which states that if a community adopts and enforces a floodplain management ordinance to reduce future flood risks to new construction in SFHAs, the federal government will make flood insurance available within the community as a financial protection against flood losses.

In support of the NFIP, FEMA identifies flood hazard areas throughout the United States and identifies SFHAs, or areas that could be subject to a 100-year flood. FEMA also establishes regulations pertaining to development within the 100-year floodplain (FEMA 1997).

State

California Coastal Act of 1976

Under the California Coastal Act of 1976 (CCA), the CCC, in partnership with coastal cities and counties, plans and regulates development within the coastal zone. Development is broadly defined under the CCA to include construction activities and use of land and water within the coastal zone. Title 14, Section 13253 of the California Code of Regulations states that a Coastal Development Permit (CDP) is required for projects located within the coastal zone that have the potential to damage the coastal environment, including utility projects. Portions of the proposed project would lie within the coastal zone and would need to comply with regulations per the CCA. Under the CCA, authority to issue CDPs is delegated to the local permitting agencies for which the CCC has certified a Local Coastal Program (LCP). Local governments, in partnership with the CCC, use the LCP implementing policies as a guide to future development activities within the coastal zone. The City of San Diego and City of Del Mar have certified LCPs that would apply to the project alignment, as described in Section 5.9.2.3, “Regional and Local” (CCC 2018).

Porter-Cologne Water Quality Control Act (California Water Code §13000 et seq.)

The Porter-Cologne Act (California Water Code, Division 7) of 1979 regulates surface water and groundwater quality in the state and assigns regulatory responsibility for implementation of CWA Sections 401 (Water Quality Certification), 402 (NPDES), 303(d) (List of Impaired Water Bodies), and 305(b) (Report on the Quality of Waters in California) to the SWRCB. The SWRCB delegated its authority to the nine RWQCBs throughout the state. The proposed project would lie entirely within the jurisdiction of RWQCB Region 9, the San Diego RWQCB. The SWRCB and RWQCBs are responsible for issuing permits for certain point source discharges and for regulating construction and stormwater runoff.

The SWRCB and RWQCBs are responsible for developing and implementing regional basin plans, which establish water quality standards for surface water and groundwater within their jurisdictions, designate beneficial uses for surface and groundwater, set goals and objectives that must be attained or maintained

to protect the designated beneficial uses, and describe implementation programs to protect waters in the region. Under Section 303(d) of the CWA, the RWQCB develops a list of impaired water bodies in which water quality is impeding the attainment of beneficial uses. Table 5.9-1 describes impaired water bodies within the project alignment.

The RWQCBs regulate discharges to waters within their respective jurisdictions through administration of NPDES permits, Waste Discharge Requirements, and CWA Section 401 water quality certifications. RWQCBs administer Section 401 water quality certifications to ensure that projects with federal 404 permits do not violate state water quality standards. The SWRCB has jurisdiction over depositing fill or dredging in “State Only Waters” and issues Waste Discharge Requirements for these projects. Construction projects may require RWQCB approval of a 401 Water Quality Certification, as well as Waste Discharge Requirements (SWRCB 2018).

Storm Water Discharge Regulations

The SWRCB adopted a general NPDES permit for construction activities that disturb more than 1 acre of land (NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities [2012], Construction General Permit, Order No. 2012-0006-DWQ, NPDES No. CAS000002). To comply with the general permit, a Notice of Intent must be filed with the RWQCB, and a SWPPP must be implemented at the commencement of grading that would control and monitor construction-related pollutants in accordance with established EPA standards, and would remain in effect until construction is completed (EPA 2018).

California Fish and Game Code Section 1602

The CDFW is responsible for conserving, protecting, and managing California’s fish, wildlife, and native plant resources. To achieve these ends, Section 1602 of the California Fish and Game Code requires an entity to notify the CDFW of any proposed activity that may substantially modify a river, stream, or lake, including ephemeral streams, desert washes, and watercourses with a subsurface flow. If the CDFW determines that the activity may substantially adversely affect fish and wildlife resources, a Lake or Streambed Alteration Agreement is required (CDFW 2017).

Regional and Local

The proposed project is not subject to local discretionary regulations because the California Public Utilities Commission (CPUC) has exclusive jurisdiction over the siting, design, and construction of the proposed project. The following discussion of the local regulations relating to hydrology and water quality is provided for informational purposes.

San Diego Association of Governments Regional Comprehensive Plan

The San Diego Association of Governments (SANDAG) Regional Comprehensive Plan includes objectives relating to protecting and restoring the integrity of watersheds and waterbodies in San Diego County and in nearby regions. The City of San Diego and the City of Del Mar are both covered by the SANDAG Regional Plan. The plan contains policies designed to improve water quality, preserve and maintain existing water resources, and establish pollution control measures. Water Quality Policy Objectives outlined in the plan include restoring, protecting, and enhancing water quality and beneficial

uses of coastal and inland surface waters and groundwater, and reducing or eliminating pollutants at their source before they enter waterbodies. (SANDAG 2004)

City of San Diego General Plan

The Conservation Element of the City of San Diego General Plan contains policies for sustainable development and associated initiatives to protect the public health and welfare. The general plan's Water Resources Management goals involve balancing water demand with supply through water efficiency and reclamation programs. The general plan also sets a goal to protect and restore wetland resources, including all existing wetland habitat, through a "no net loss" approach.

- *CE-B.4* – Limit and control runoff, sedimentation, and erosion both during and after construction activity.
- *CE-C.6* – Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters
- *CE-E.2* – Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.
- *CE-E.3* – Require contractors to comply with accepted storm water pollution prevention planning practices for all projects.
- *CE-E.4* – Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection
- *CE-E.5* – Assure that City departments continue to use "Best Practice" procedures so that water quality objectives are routinely implemented.
- *CE-E.6* – Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.
- *CE-E.7* – Manage Floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation while also promoting public health and safety.

Additionally, the Public Facilities, Services, and Safety Element of the City of San Diego General Plan requires that all development projects obtain a Municipal Storm Sewer System Permit (MS4 Permit) and implement stormwater control and site design practices to minimize pollutant generation and runoff during construction. (City of San Diego 2008)

City of San Diego Urban Water Management Plan

Appendix F of the City of San Diego Urban Water Management Plan contains a Drought Contingency Plan that should be implemented within the city during drought conditions of varying severity, as defined in the City of San Diego Municipal Code, and further described in Appendix H (Emergency Water Regulations) of the City of San Diego Urban Water Management Plan. The Drought Contingency Plan describes appropriate methodological responses to five water supply conditions, Normal to Drought Response Level Four, depending on the percent by which water demand must be reduced in response to

the drought conditions. As Drought Response Levels increase from Level 1 to Level 4, so do restrictions on vehicle and equipment washing, irrigation, and use of water for other purposes, including construction (SDWCA 2016).

City of San Diego Land Development Manual

Appendix O of the Land Development Manual contains the Stormwater Standards Manual, which defines requirements for water quality treatment consistent with the Model Standard Urban Stormwater Mitigation Plan. The manual provides information to SWPPP permit applicants about how to adequately prevent runoff and erosion associated with construction and development projects. Section IV of the Land Development Manual, Revegetation and Erosion Control Guidelines, defines procedures for slope stabilization and revegetation and provides guidance on the selection, design, and incorporation of best management practices (BMPs) into project design (City of San Diego 2012).

North City Future Urbanizing Area Framework Plan

The North City Future Urbanizing Area Framework Plan contains regulations pertaining to development adjacent to significant natural areas and open space areas. The regulations are intended to minimize impacts to water resources in those areas. Implementing Principle 4.10b from the Framework Plan requires that development projects adjacent to natural areas protect existing drainageways from encroachment that might affect drainage patterns or water quality through the use of setbacks/buffers (City of San Diego 2014a).

Via De La Valle Specific Plan

The Via De La Valle Specific Plan contains goals and objectives pertaining to conservation practices, erosion and sedimentation prevention, and topics specific to the coastal zone with respect to the hydrological setting within the subarea. The Resources Management Element of the Specific Plan requires that temporary erosion control measures be incorporated into grading and construction phases of projects within the subarea so that sediments are removed before runoff enters the storm drain system that flows into the San Dieguito River. The Coastal Element of the Via De La Valle Specific Plan applies similar goals and objectives specifically to the coastal zone (City of San Diego 2007).

Torrey Hills Community Plan

The Torrey Hills Community Design Element contains measures intended to minimize impacts to hydrological resources within the subareas. The Community Design Element contains grading and construction policies that would reduce sedimentation risk. For example, grading plans should conform to described seasonal policies in the Torrey Hills Community Plan and ensure that unstabilized areas of ground disturbance are suitably prepared for seasonal rains (City of San Diego 2014b).

Torrey Pines Community Plan

Goals described in the Resource Management and Open Space Element in The Torrey Pines Community Plan contain regulations intended to maintain, protect, and improve hydrological resources within the subarea. Development projects should utilize strategies such as minimizing grading during the rainy season, installing sediment basins and/or energy dissipating structures, and revegetation to avoid

1 sedimentation, erosion or other impacts that would degrade the quality of the water resources and
2 Environmentally Sensitive Habitat Areas (see Section 5.4, “Biological Resources”).

3
4 The Torrey Pines Community Plan also requires those applying for CDPs for projects located within the
5 Los Peñasquitos watershed to enter into an agreement with the City of San Diego and the State Coastal
6 Conservancy to pay a Los Peñasquitos watershed restoration and enhancement fee to the Los Peñasquitos
7 Lagoon Fund, as described in Policy 4 from the Open Space and Resources Management Element specific
8 to the Coastal Zone. The enhancement fee shall be determined by the surface area within the coastal zone
9 that would be affected by grading for development, payable at a rate of \$0.005/square foot, and an
10 additional \$0.03/square foot for impervious surface(s) created by the development (City of San Diego
11 2014c).

12
13 City of Del Mar Local Coastal Plan

14 Chapter 30.29 of the City of Del Mar Local Coastal Plan contains ordinances specific to portions of the
15 city within the Floodway Zone. The ordinances prohibit the construction of permanent structures in the
16 floodway, allowing only structures and uses that would not result in further danger were a flood to occur.
17 It prohibits the placement of permanent structures within the floodway zone.

18
19 Chapter 30.53 of the City of Del Mar Local Coastal Plan contains ordinances specific to the Lagoon
20 Overlay Zone, which pertains to properties that are located within or within close proximity to the San
21 Dieguito and Los Peñasquitos Lagoons. It contains draining and erosion control policies intended to
22 minimize runoff into aquatic resources from grading activities. Development projects within the Lagoon
23 Overlay Zone shall ensure that runoff from impervious services be directed into existing public drainage
24 or discharge systems, or be retained onsite utilizing settling ponds or other measures as appropriate.
25 Construction projects shall install erosion control measures such as berms, sandbagging, hay bales, or
26 other appropriate devices prior to the start of grading activities, and shall be removed within 30 days of
27 project completion. Projects that will involve more than 25 cubic yards of cut and/or fill grading shall not
28 conduct grading activities between November 15 and March 31. If activities within a graded area are not
29 complete by November 15, the area should be prepared to prevent soil loss associated with potential
30 heavy rains. Permits for development within the Lagoon Overlay Zone are subject to the submittal of a
31 Polluted Runoff Control Plan, which shall describe how pollutant runoff will be minimized during
32 construction.

33
34 Chapter 30.75 of the City of Del Mar Local Coastal Plan contains ordinances specific to CDPs. Major
35 public works projects and/or energy facility projects within the Coastal Zone are subject to CDP issuance,
36 pursuant to the provisions described in the California Coastal Act Section 30600. In instances in which a
37 development project within the Coastal Zone would cross jurisdictional boundaries, as would the
38 proposed project, the developer must obtain a CDP from each jurisdiction for the corresponding work that
39 would occur in each area (City of Del Mar 2001).

5.9.3 Environmental Impacts and Assessment

Approach to Impact Assessment

The following impact analyses consider whether implementation of the proposed project would result in significant impacts to hydrology and water quality. The analyses focus on reasonably foreseeable project construction activities to result in substantial and adverse hydrological impacts compared to baseline conditions. The analyses use significance criteria based on the California Environmental Quality Act Appendix G Guidelines. They define potential direct and indirect effects of the proposed project during the construction and operation and maintenance phases, and identify mitigation measures to avoid or reduce significant impacts to hydrology and water quality.

Applicant-Proposed Measures

The applicant has not incorporated applicant-proposed measures (APMs) into the proposed project to specifically minimize or avoid impacts related to hydrology and water quality. A list of all project APMs is included in Table 4.-1. However, as part of the process required to obtain a Construction General Permit (Order 2009-0009-DWQ [as amended by 2010-0014-DWQ and 2012-0006-DWQ] and a NPDES permit for Phase II Small MS4s, the applicant would develop a Stormwater Pollution and Prevention Plan (SWPPP) with best management practice measures, including (but not necessarily limited to) the following, to prevent stormwater runoff, erosion, sedimentation, and pollution associated with project construction (County of San Diego Department of Planning and Land Use 2010):

- Silt fences for onsite soil retention and along streams, channels, and project boundaries;
- Preservation of existing vegetation to the extent practicable;
- Identification of pollutant sources and non-stormwater discharges that could result from project construction;
- Consideration of temporary soil stabilization methods such as mulch, hydroseeding, and/or approved mats or blankets in disturbed/graded areas for erosion control;
- Fiber/straw wattles along grade breaks, stockpiles, perimeters, etc.;
- Gravel bags and sandbag barriers for flow diversion or parallel to roadways to keep sediment off of paved areas; and
- Using dewatering strategies such as a dewatering tank, or a sediment/desilting basin, in the instance of a need to conduct dewatering activities associated with trenching.

Significance Criteria

Table 5.9-2 includes the significance criteria from Appendix G of the CEQA Guidelines' hydrology and water quality section to evaluate the environmental impacts of the proposed project.

Table 5.9-2 Hydrology and Water Quality Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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 (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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project would result in the installation of some permanent features, including one aboveground pad-mounted transformer within a 4.2-foot tall steel enclosure along the underground duct bank route, and steel and wood poles. All other existing project features would be removed from their existing alignment, and either be topped in their existing locations or installed underground in existing right-of-way (ROW) that would be backfilled to preexisting conditions or realigned to existing poles. There would therefore be substantial increase in the footprint of impervious surfaces within the project alignment upon project

completion, when compared to existing conditions. No permanent operational features associated with the project components would involve altering the existing course of a stream, river, or water feature or would increase the potential for flooding within or surrounding the project alignment. Project operation and maintenance activities would occur within an existing ROW where utilities operations and maintenance activities already occur, and there would be no change of such activities associated with project construction, with respect to hydrology.

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

Trenching activities associated with underground duct bank construction could potentially encounter water, which would require dewatering activities. However, strategies to manage project-related water resources, would be part of SDG&E's mandatory Stormwater Pollution and Prevention Plan (SWPPP). The approved SWPPP would incorporate measures such as desiltation tanks and/or additional treatment or filtering methods that would be performed until and encountered water meets applicable permit requirements. The SWPPP would also apply to the potential for stormwater runoff, sedimentation, and other water-related concerns during project construction. In operation, the proposed project would not discharge any water. Therefore, through incorporation of the SWPPP, no violations of water quality standards or waste discharge requirements are anticipated, and impacts would be less than significant.

Significance: Less than Significant

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 (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)?

As indicated in the ~~Section~~ Chapter 4.0, "Project Description", and 5.3, "Air Quality", the proposed project would require water to suppress fugitive dust on non-paved portions of roads and access ways throughout the project alignment. SDG&E estimates that between 584,000 and up to 700,000 gallons of water (or about 2 acre-feet) would be required for this effort. This is considered a conservative estimate because the data assumes a 20 percent buffer for areas surrounding stringing sites, fly yards, staging yards, work areas, and existing access roads where dust suppression may be necessary, and a 0.05-inch deep treatment area across all described work areas (SDG&E 2018). SDG&E and/or its contractors would acquire this water from municipal water suppliers and in so doing would not result in depletion of groundwater supplies or interfere with ground water recharge. The proposed project's operation and maintenance activities would not alter water usage within the area from its current conditions in a way that would deplete groundwater supplies or interfere with groundwater recharge. Therefore, no operational impacts to groundwater resources are anticipated.

Significance: Less than Significant

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?

Trenching activities during construction would be temporary and would occur in segments of 300 to 500 feet. If a rain event were to occur during trenching activities, water could drain into the trench, which would be a substantial change in the existing drainage pattern of the site or area and could result in erosion, siltation, or sedimentation.

During construction, equipment would be staged adjacent to active waterways, including streams and rivers, but not within active waterways such that equipment or project-related activities would alter existing drainage patterns or stream/river courses in a manner that would lead to erosion or siltation. The four project laydown yards and staging areas would be placed entirely within flat, previously disturbed, or developed areas (two on flat, pre-compacted dirt in developed areas, one within an athletic field, and one within a parking lot), so staging yard preparation would not involve substantial earth moving that could alter existing drainage patterns. Grading throughout construction would be minor and may be required incidentally within portions of the 24 0.1-acre stringing sites associated with overhead power line construction, depending on topography. Most stringing sites are located along existing roadways or in pre-disturbed areas adjacent to existing poles and would not require substantial grading. Additionally, helicopter activities within the San Dieguito Lagoon and Los Peñasquitos Lagoon would be brief (approximately 10 days), and work would be restricted to Helicopter Drop Zones (100 square feet to 256 square feet), temporary footpaths/access roads, and work areas surrounding existing pole features during the dry season, when rain events that could cause interference between project activities and existing drainage patterns would be unlikely to occur.

To minimize the potential for erosion or siltation associated with construction activities, the applicant would be required to develop a SWPPP that includes appropriate BMPs such as silt fencing and soil stabilization methods that would minimize erosion and/or siltation, to be submitted to the SWRCB for approval as part of compliance with the Construction General Permit. The SWPPP will additionally minimize the potential for increased flooding associated with construction activities.

Upon installation, most of the proposed project would be within existing ROW, where operation and maintenance activities similar to those that would result from the proposed project already occur. Additionally, no new structures or operation and maintenance activities would substantially increase the extent of impervious surfaces within the project alignment or would alter the existing drainage pattern of the site or area, and no substantial surface runoff would occur from operation and maintenance procedures associated with the proposed project.

Significance: Less than Significant

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 aspects of construction associated with the proposed project would alter existing drainage patterns associated with streams or rivers. No new paved areas would be installed as part of the proposed project.

Trenching activities would be temporary, and would occur in segments of 300-500 feet. If a rain event were to occur during trenching activities, water could drain into the trench, which would be a substantial change in the existing drainage pattern of the site or area. To minimize the potential for increased flooding associated with construction activities, the applicant shall adhere to protocols outlined in their required SWPPP, including appropriate BMPs that would minimize flooding.

Upon installation, most of the proposed project would be within existing ROW, where operations and maintenance activities similar to those that would result from the proposed project already occur. Additionally, no new structures or operations and maintenance activities would substantially increase the extent of impervious surfaces within the proposed project alignment or would alter the existing drainage pattern of the site or area, no substantial surface runoff would occur from operations and maintenance procedures associated with the proposed project.

Significance: Less than Significant

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

Water use associated with project construction would be minimal and would primarily be associated with dust control on unpaved roads. Water application would be restricted to the amount necessary to control dust and would not result in substantial runoff.

Upon installation, most of the proposed project would be within existing ROW, where operation and maintenance activities similar to those that would result from the proposed project already occur. Operation and maintenance activities associated with the proposed project would not require substantial water resources. Additionally, no new structures or operation and maintenance activities would substantially increase the extent of impervious surfaces within the proposed project alignment or would alter the existing drainage pattern of the site or area, and no substantial surface runoff would occur from operation and maintenance procedures associated with the proposed project.

Significance: No Impact

f. Would the project otherwise substantially degrade water quality?

While the four laydown yards and staging areas would be restricted to flat, pre-disturbed areas, two of them (the Durante Fly Yard and the Torrey Pines Fly Yard) would be located adjacent to water features. If a spill were to occur within these staging areas/laydown yards, it could potentially enter nearby water features and degrade water quality. Spills within helicopter drop zones in the San Dieguito or Los Peñasquitos Lagoons could also substantially degrade water quality.

To minimize the risk of contaminants and/or pollutants entering water bodies from laydown yards/staging areas, helicopter drop zones and associated work areas, the applicant shall adhere to **MM HAZ-1**, which would require the implementation of a Hazardous Materials and Waste Management Plan and Emergency Spill and Evacuation Training that, among other things, would train workers in appropriate spill prevention and response measures in the event that such a spill were to occur at a staging area/laydown yard, and would restrict fueling and equipment maintenance activities to laydown yards/staging areas to prevent the potential for spills within helicopter drop zones in the lagoons. Additionally, though

incorporation of the anti-erosion, runoff containment, and pollution prevention measures as defined by the applicant's required SWPPP, the applicant would reduce the risk of substantially degrading water quality through project construction activities. The SWPPP would also include BMPs prohibiting the accumulation of trash at work areas that could flow offsite and degrade water quality.

Upon completion, most project components would be within existing ROW, where operation and maintenance activities similar to those that would result from the proposed project already occur. Operation and maintenance activities would not require the use of pollutants that could substantially degrade water quality. Additionally, no new structures or operation and maintenance activities would substantially increase the extent of impervious surfaces within the project alignment that could potentially inadvertently direct pollutants from offsite into nearby water resources, therefore substantially degrading water quality.

Significance: Less than Significant

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?

There are no housing units or developments associated with the proposed project, and the proposed project would not redirect potential floodwaters to a new route with existing housing units. Therefore, there would be no impacts associated with proposed project's construction or operation and maintenance activities with respect to housing within a 100-year flood hazard area.

Significance: No Impact

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

During construction, temporary structures such as fences, construction trailers, portable restrooms, and storage containers would be installed within the project alignment, which would be located partially within a 100-year flood hazard area. These structures would be small and impermanent, and would not impede or redirect flood flows during a significant flooding event.

The only new permanent structures associated with operation and maintenance of the proposed project that would have a footprint within a 100-year flood hazard area would be an encased transformer, three steel poles, and five wood poles. All combined structures would have a total footprint of less than 0.01 acres, across the approximately 7-mile-long proposed project alignment. The total footprint of these operational structures would not substantially redirect flood flows. Moreover, no project operation and maintenance activities would require the installation of any new impervious surfaces that could substantially redirect flood flow runoff or floodwaters.

Significance: No Impact

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?

Proposed project construction activities within and near the San Dieguito River would be located within a dam inundation hazard area, were the Lake Sutherland Dam or the Lake Hodges Dam to breach or require

emergency water discharge. Temporary construction-related structures such as fences, construction trailers, portable restrooms, and storage containers would be installed in areas adjacent to the San Dieguito River. These structures would be temporary and would not impede or redirect flood flows during significant flooding.

Some proposed project activities would occur within the San Dieguito Lagoon, which would be subject to extreme flooding resulting from a dam inundation event. This would present a significant risk to construction workers. As a safety and protection measure, and in accordance with **MM HAZ-1**, the applicant shall develop a Dam Failure Evacuation Safety Training session as part of the Worker Environmental Awareness Program that would train workers in how to safely evacuate in the rare event of a dam failure that could inundate the San Dieguito River. In addition, in accordance with **MM BR-6** (see Section 5.4, “Biological Resources” for more information), work in the lagoon would be limited to September 1 to November 14, prior to the rainy season. Therefore, activities would be unlikely to coincide with extreme rain events that could yield upstream dam inundations.

The only new permanent structures associated with operation and maintenance of the proposed project within a 100-year flood hazard area would be an encased transformer, three steel poles, and five wood poles. All combined structures would have a total footprint of less than 0.01 acres, across the approximately 7-mile-long project alignment. The total footprint of these operational structures would not substantially redirect flood flows. Additionally, there would be no increase in impervious surfaces associated with project operation and maintenance that would substantially redirect runoff associated with flood flows, or redirect floodwaters. Moreover, operation and maintenance activities within the project alignment would be sporadic, as upon completion the facility would not be permanently staffed. It would therefore be highly unlikely that staff would be present during a rare 100-year flood or dam inundation event.

Significance: Less than Significant with Mitigation Incorporation

j. *Would the project expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow?*

Project construction activities within and near the San Dieguito Lagoon and the Los Peñasquitos Lagoon would occur within Tsunami Emergency Response Planning Zones (Cal OES 2015). During construction, temporary construction-related structures such as fences, construction trailers, portable restrooms, and storage containers would be installed in areas adjacent to the San Dieguito Lagoon and the Los Peñasquitos Lagoon. Such structures could potentially be damaged in the rare event of a tsunami. Upon completion, the proposed project’s removal of poles would result in fewer structures in the risk area than exist under current conditions. As such, the proposed project would not increase the risk of damage to infrastructure resulting from a tsunami inundation. During proposed project construction, employees would be familiar with safe evacuation procedures in accordance with **MM HAZ-1**, in the rare event of an emergency such as a potential tsunami during proposed project construction.

No project component would traverse areas of high landslide risk. Identified hydrologic features that would be crossed by the proposed project include drainages, scours, and estuaries and associated estuarine components (tidal inlets, saltpan, and perennial marshlands). These are not the types of hydrologic

features that generally pose a high risk of seiches, which require closed or nearly closed basins, such as lakes and reservoirs. Therefore, the proposed project does not pose risk of exposure to seiche activity.

Project operations and maintenance would be similar to those already occurring within existing utility ROW along the existing project alignment. Therefore, operation and maintenance activities would not increase people's risk of exposure to tsunamis, seiches, or mudflows. There will be some new permanent facilities associated with operation and maintenance of the proposed project that would be located within a tsunami risk zone, though these facilities would be replacing existing facilities also within the risk zones. There would therefore not be any changes in risk associated with operation and maintenance of the proposed project.

Significance: Less than Significant with Mitigation Incorporation

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5.10 Land Use and Planning

5.10.1 Environmental Setting

Utility Corridors

The proposed project would entail modification and removal of power lines and installation of supporting infrastructure (conductor, conduit, and poles) in the cities of San Diego and Del Mar. As described in detail in Chapter 4, “Project Description,” activities would occur along approximately 6 miles of existing overhead power line between the Del Mar Substation (northwest of the intersection of Interstate 5 [I-5] and Via de la Valle) and an existing steel pole located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive (TL666D). Project components would also be installed underground beneath San Dieguito Drive and Racetrack View Drive (C510) and beneath the Sorrento Valley Pedestrian/Multi-Use Path (C738).

This section evaluates potential land use impacts based on the physical changes to the existing environment that could be caused directly or indirectly by project construction (including activities at temporary workspaces) and operation. The significance of effects expected to result from the proposed project is evaluated according to the criteria presented in Table 5.10-1.

Existing Land Uses

Existing land uses adjacent to the proposed project’s utility corridors are presented here based on a review of maps prepared by the Planning and Community Development Department in Del Mar and the Planning Department of the City of San Diego, as well as field observations made during a site visit in March 2018. The proposed project’s four components account for a combined linear distance of approximately 8.0 miles of electrical transmission lines, part of a larger network in the greater project vicinity. The northernmost corridor alignment (TL6973D and TL674A) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and open spaces, including San Dieguito River Park, and Del Mar Horse Park, and Del Mar Fair Grounds.

~~North South~~ of Via Del La Valle, immediately west of I-5, the TL666D corridor roughly parallels Jimmy Durante Boulevard, passing by the Del Mar Fairgrounds, follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian. The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. ~~The TL666D corridor spans the fairgrounds’ surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard. TL666D then follows a segment of the Coast to Coast Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.~~

The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the

hillside west of San Dieguito Drive. ~~South~~ North of Crest Canyon Open Space Park, ~~north of the~~ and the Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead ~~adjacent to west of Minorea Cove and behind the Del Mar Hills Elementary School grounds, adjacent to I-5.~~ Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open space. TL666D spans approximately 0.5 miles across the Torrey Pines Natural Reserve Extension Area in a southerly alignment, where power lines cross ~~residences~~ residential areas and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through the Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to an existing riser pole-12 kilovolt (kV)-tap on the eastern side of the freeway.

Project components would also be installed within a Class I (pedestrian and bicycle-exclusive use) segment of the Sorrento Valley Road Multi-use Trail, which originates at Carmel Valley Road and travels adjacent to I-5 (City of San Diego 2013). Industrial and commercial land uses are prevalent south of the Torrey Pines Natural Reserve reflected by the office buildings, warehouses, and automotive service centers in the area.

5.10.2 Regulatory Setting

Federal

No federal lands are located within the project area; therefore, no federal regulations related to land use are relevant to the proposed project.

State

California Coastal Act of 1976

The California Coastal Commission (CCC), in partnership with coastal cities and counties, plans and regulates development in the coastal zone in accordance with the California Coastal Act of 1976 (CCA). The CCA broadly defines “development” to include construction activities and the use of land and water within the coastal zone. Title 14, Section 13253 of the California Code of Regulations states that a Coastal Development Permit (CDP) is required for projects located within coastal zones that have the potential to damage the coastal environment, including utility projects. Section 13253 defines coastal zones as “property ... located between the sea and the first public road paralleling the sea or within 300 feet of... the mean high tide line of the sea where there is no beach.” Portions of the project area are within the coastal zone and are therefore subject to CCA regulations. The CCC delegates authority to issue CDPs to local permitting agencies with certified a Local Coastal Programs (LCPs). Local governments, in partnership with the CCC, use LCP implementing policies to guide future development activity within the coastal zone.

The cities of San Diego and Del Mar have certified LCPs that encompass the project area. The Coastal Zone is divided into a number of planning units. Within the city of San Diego, the proposed project would be located within the North City LCP. The North City LCP is divided into sub-segments, of which the following four are relevant to the proposed project: the Torrey Pines Community Plan, Torrey Hills

Community Plan, Via De La Valle Specific Plan, and North City Future Urbanizing Subarea II (San Dieguito) Framework Plan. Policies in these plans have been designed to protect and enhance California's coastal resources and to conform to LCPs in their respective areas.

Natural Community Conservation Planning Act

The Natural Community Conservation Planning Act of 1991 (NCCP) was designed to conserve natural communities at the ecosystem scale, while accommodating compatible land uses. The California Department of Fish and Wildlife (CDFW) is the principal state agency implementing the NCCP program. The NCCP, established in 1995 by agreement between SDG&E, the U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife, represents an approach to the long-term preservation of sensitive habitat and animal species within an ecosystem where SDG&E's develops, operates, and maintains electrical facilities. Project components would be located on lands subject to SDG&E's Subregional NCCP, the County of San Diego Multiple Species Conservation Plan (MSCP), and the Water Authority's Subregional NCCP/Habitat Conservation Plan (HCP). Relevant policies and protocols are discussed further in Section 5.4, "Biological Resources" and 5.9, "Hydrology and Water Quality." No relevant policies related to land use are contained within SDG&E's Subregional NCCP.

~~California Public Utilities Commission General Order No. 131-D~~

~~The California Public Utilities Commission (CPUC) has sole and exclusive jurisdiction over the siting and design of the proposed project; therefore, CPUC projects are exempt from local land use regulations and discretionary permitting.¹ However, General Order No. 131-D, Section XIV.B states: "the public utility shall consult with local agencies regarding land use matters." Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. The public utility, under jurisdiction of the CPUC, is required to obtain any non-discretionary local permits (CPUC 1995).~~

Regional and Local

In accordance with California Public Utilities Commission (CPUC) General Order No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the proposed project; therefore, CPUC projects are exempt from local land use regulations and discretionary permitting.¹ However, General Order No. 131-D, Section XIV.B states: "the public utility shall consult with local agencies regarding land use matters." Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. The public utility, under jurisdiction of the CPUC, is required to obtain any non-discretionary local permits (CPUC 1995).

San Dieguito River Park Concept Plan

The San Dieguito River Park Concept Plan is operated under the San Dieguito River Park Joint Powers Authority agreement between the County of San Diego and Cities of Del Mar, Escondido, Poway, San Diego, and Solana Beach. The planning effort was initiated to preserve the San Dieguito River Valley's sensitive resources and rural character and to provide a concept for future recreational amenities within the planning area. The Joint Powers Authority intends for member agencies to adopt the Concept Plan and

¹ The CPUC does not require land use or discretionary approval from a local agency body such as a planning commission, city council, or county board of supervisors.

incorporate it into local planning documents accordingly. The Concept Plan has also been coordinated with the MSCP and its implementing agreements (San Dieguito River Park Joint Powers Authority 2002).

City of Del Mar Community Plan

The City of Del Mar Community Plan—also known as the city’s General Plan—is Del Mar’s “constitution for development.” It comprises multiple elements that provide a comprehensive slate of citywide and location-based policies for growth and development. The Community Plan also includes policies to protect open space and habitat within the San Dieguito River Floodway and Lagoon, an area where a portion of the removal work associated with TL666D is proposed (City of Del Mar 1976).

City of Del Mar Local Coastal Plan

Del Mar’s Local Coastal Plan is a compilation of goals, policies, and recommendations to achieve compliance with the CCA. The plan includes various mandatory elements pertaining to development of the coastline, preservation of natural and visual resources, and maximizing the physical use and enjoyment of the coastal zone by the public. The Land Use Plan, which is part of the Local Coastal Plan, is a compulsory LCP element that identifies the makeup of the community through a system of designations characterizing land uses for all property within the city. Policies in the Land Use Plan revolve around a central theme of preserving the existing character of Del Mar and its vicinity. (City of Del Mar 1993)

City of Del Mar Municipal Code

Del Mar’s Municipal Code implements the designations identified in the Land Use Plan through the imposition of specific controls, requirements, and performance standards stipulating where certain types of uses may be permitted and how intensely such uses may operate. Within Del Mar, a portion of the existing TL666D utility corridor traverses land designated Commercial (Racetrack-Fairgrounds, North Commercial); Open Space (Floodway Zone); and Residential (Very Low Density Residential). (City of Del Mar 2017)

City of San Diego General Plan

The proposed project would be located in part within the city of San Diego. Approximately 1.28 miles of TL674A, 6.24 miles of TL666D, 1.06 miles of the C510 conversion, and 0.12 miles of the C738 conversion are within the city. The city’s General Plan establishes the framework of policies, objectives, and land use designations to guide long-term development (City of San Diego 2015).

City of San Diego Municipal Code

The proposed project corridor would cross several zoning districts within the city of San Diego: Agriculture Residential, Commercial (Community Commercial, Commercial Visitor), Open Space (Open Space Park, Open Space Floodway), Residential (Very Low Density Residential, Residential Single Unit, Multiple Unit Residential, and Industrial (Industrial Light) (City of San Diego 2017). As previously discussed, the proposed project would not be subject to local discretionary regulations due to the CPUC’s exclusive jurisdiction over electric transmission facilities in the state of California, pursuant to CPUC General Order No. 131-D (CPUC 1995).

Torrey Pines Community Plan and Local Coastal Program

The area covered by the Torrey Pines Community Plan comprises primarily open space and sensitive environmental resources, such as the San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Reserve, and Crest Canyon. SDG&E infrastructure, including the Del Mar Substation and five overhead 69 kV power lines, is located within the Torrey Pines Community Plan area. Accordingly, the City of San Diego considers utility lines that traverse sensitive environmental resources to be impactful and should be rerouted as feasible. The Torrey Pines Community Plan includes implementing policies of the LCP specific to the community (City of San Diego 2014a).

Torrey Hills Community Plan

The area covered by the Torrey Hills Community Plan is bounded by Los Peñasquitos Canyon Preserve and I-5 and is located adjacent to the Torrey Pines and the Carmel Valley Community Plan areas (City of San Diego 2014b). An approximately 123-acre portion of the Torrey Hills Community Plan is located within the California Coastal Zone. This plan provides policies to guide future development within the coastal zone. SDG&E owns a 40-acre facility that accommodates a 230 kV substation located east of the project area. Major utility corridors connect to this substation within the area covered by the Torrey Hills Community Plan.

Via De La Valle Specific Plan

The approximately 125-acre area covered by the Vie De La Valle Specific Plan is located east of I-5 in the northwestern sector of the city of San Diego. A series of existing overhead kV transmission lines are located within a 150-foot-wide SDG&E easement within this planning area. A local coastal element-compatible land use policy for Via De La Valle indicates that utilities should be placed underground. (City of San Diego 1984)

North City Future Urbanizing Subarea II Framework Plan

The proposed project would be located within Subarea II near the San Dieguito River valley and within the California Coastal Zone. The North City Future Urbanizing Subarea II Framework Plan does not contain any specific policies that are relevant to the proposed project. (City of San Diego 2014c)

Conservation Plans

The following conservation plans include policies to preserve a network of habitat and open space land uses within the proposed project corridor in order to maintain ecosystems and biodiversity.

County of San Diego Multiple Species Conservation Program (MSCP)

The San Diego MSCP, governed by the County of San Diego, serves as an MSCP pursuant to Section 10(a)1(b) of the Endangered Species Act and a Natural Community Conservation Plan under the California Natural Communities Conservation Planning Act. The MSCP was developed to protect biodiversity and enhance the quality of life in the region through the preservation of a network of habitats and open space areas. The area covered by the San Diego MSCP is known as the Multiple Planning Habitat Area (MHPA). The MSCP outlines specific criteria and requirements for projects within the MHPA and authorizes take for 85 covered species. (City of San Diego 1998)

Local jurisdictions implement their respective portions of the San Diego MSCP Plan through subarea plans, which describe specific implementing mechanisms for the San Diego MSCP. The San Diego MSCP Subarea Plan, also referred to as the South County MSCP, applies to unincorporated lands within southern San Diego County. The City of San Diego has also adopted a subarea plan. Additionally, much of the proposed project would be within the northern area of the city of San Diego MHPA in Los Peñasquitos Lagoon and Torrey Pines State Natural Reserve Extension. The regional MSCP subarea plans collectively serve as a multiple species HCP pursuant to Section 10(a)(1)(b) of the federal Endangered Species Act.

The San Diego MSCP allows for the development of infrastructure and utility projects and road modifications within MHPA boundaries if a project is consistent with adopted community or subregional plans, and incorporates appropriate mitigation strategies and/or alternatives to minimize impacts to sensitive biological resources. Projects within the MHPA must demonstrate compliance with the land use considerations described in the MSCP that are intended to preserve biological resources. Utility lines are considered conditionally compatible with the MHPA when developed in accordance with the described measures. Projects within the MHPA must demonstrate compliance with the land use adjacency policies.

San Diego Gas & Electric Subregional Natural Community Conservation Plan (NCCP)

The current SDG&E NCCP was approved in December 1995 and authorized the take of 110 covered species resulting from SDG&E's ongoing activity impacts, including installation, use, maintenance, and repair operations and expansion of its systems (SDG&E 1995). The current NCCP prescribes as "operational protocols" various protection, mitigation, and conservation measures that SDG&E must implement as part of its covered activities to ensure the survivability and conservation of protected species and their habitat. The 61 operational protocols provided in the current NCCP include provisions for personnel training; pre-activity studies; and maintenance, repair, and construction of facilities, including access roads, survey work, and emergency repairs. The proposed project would located within the area where SDG&E's utility operations are currently covered by the current NCCP. SDG&E may elect to utilize their NCCP to permit the proposed project's impacts to covered species and their habitat. Relevant operational protocols are reflected in the topical analyses in this Initial Study as applicant-proposed measures, best management practices, or mitigation measures as warranted.

5.10.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

No applicant-proposed measures are identified to address the topic of land use.

Significance Criteria

Table 5.10-1 includes the questions from Appendix G of the CEQA Guidelines to evaluate the proposed project's potential to cause environmental impacts related to land use based on the three significance criteria below.

Table 5.10-1 Land Use and Planning Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable land use plans, 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project physically divide an established community?

The physical division of an established community is typically associated with loss of mobility through a neighborhood or between a community and its outlying areas. For example, construction of a freeway could create a barrier to accessing an existing neighborhood just as removal of a roadway could limit accessibility that could potentially divide an established community. The area surrounding the proposed project supports a variety of uses, including recreation and open space, infrastructure, residential, commercial, and industrial. Residential communities exist along the entire proposed corridor.

As described in Chapter 4, "Project Description," the proposed project would involve removal and reconfiguration of approximately 6 miles of overhead 69 kV power line in designated corridors (TL666D; TL674A; C510 and C738) and implementation of the proposed project would neither disrupt nor divide surrounding communities. Because this activity involves the removal of an existing overhead power line, it would not physically divide an established community. Construction work would occur along the corridor alignments within existing city rights-of-way and SDG&E utility easements. Ancillary workspaces would function as access areas, stringing and or pole installation/removal sites, fly yards, and staging and/or lay-down areas for the storage of equipment and materials on a temporary basis. As illustrated in Table 5.10-2, most temporary workspaces would be established on land zoned for open space and for residential use. Fly yards and underground work areas would necessitate the greatest spatial needs by type of space.

During construction, SDG&E would extend existing power lines underground that would require temporary lane closures for excavation within city streets to install duct banks, particularly along Via De la Valle. Pole removal and topping would occur along the entire project corridor, including within some residential areas, particularly near San Dieguito Drive, Minorca Way, Mango Drive, the area north of Carmel Valley Road, and near Del Mar Hills Elementary School. These activities may temporarily disrupt normal traffic flow between neighborhoods and businesses along Via De La Valle, San Dieguito Drive, and Racetrack View Road.

Table 5.10-2 Temporary Work Spaces (in acres)

Type of Work Area	Zoning Categories ^(a)					
	Residential	Commercial	Industrial	Open Space	Misc.	Total
Drop Zone	0.01	-	0.01	0.04	-	0.06
Fly Yard	0.92	-	-	5.1	0.10	6.12
Guard Structure Work Area	0.03	0.02	0.01	0.01	0.01	0.08
Pole Work Area	0.36	0.05	0.09	0.23	0.03	0.76
Pole Work Area (Pedestrian Access Only)	0.05	-	-	0.07	-	0.12
Staging Yard	1.11	-	-	-	-	1.11
Stringing Site	1.09	0.38	0.23	0.44	0.32	2.46
Underground Work Area	1.61	2.80	0.01	0.59	-	5.01
Work Area	0.56	0.01	-	0.03	-	0.60
Acres by Zoning Category	5.74	3.26	0.35	6.51	0.46	16.32

Source: SanGIS 2016

Note:

(a) Zoning districts are condensed and acreages are broadly represented for illustrative purposes in generalized categories.

Key:

Misc. = miscellaneous

- = no project work areas within lands designated under this zoning category

Although construction of the proposed project would require lane closures, construction traffic restrictions would be temporary and intermittent in duration. As described in Section 5.16, “Transportation and Traffic,” SDG&E would stage trenching operations to maintain vehicular and pedestrian traffic across areas that are not under active construction. In addition, as described in Chapter 4.0, “Project Description,” SDG&E would locate staging and fly yards within previously disturbed areas that are mostly industrial or commercial in nature (parking lots, vacant fields, etc.) as a means of limiting construction traffic on active roadways. As a result, the proposed project would not create permanent physical barriers that would divide established communities or isolate land uses, and the impact would be less than significant.

Once project construction is complete and the reconfigured circuitry is operational, the power lines would require occasional maintenance to ensure safety and reliability of the electrical network. Utility infrastructure would be maintained by SDG&E personnel in the same manner as it is currently. Similar to existing infrastructure, the proposed project would comprise overhead and underground lines, and maintaining these facilities would not conflict with or change the facilities’ relationship, compatibility, or functionality with adjacent land uses. Moreover, the removal and decommissioning of approximately 6 miles of 69 kV power lines on line TL666D would eliminate service demands and future maintenance needs within this corridor relative to existing conditions. As a result, implementation of the proposed project would neither create new barriers nor divide established communities. This impact would be less than significant.

Significance: Less than Significant.

b. Would the project 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?

The proposed project would be located within the California Coastal Zone and subject to a CDP from the CCC. Local governments, in partnership with the CCC, use the LCP implementing policies as a guide to future development activities within the coastal zone. The City of San Diego and City of Del Mar have certified LCPs that would apply to the project area.

A potential or actual conflict between a proposed project and policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. A policy inconsistency is considered significant pursuant to CEQA only when it would result in a significant, adverse physical environmental impact. As described in Section 5.4, “Biological Resources,” the biological study area for the proposed project includes areas that are recommended to be classified Environmentally Sensitive Habitat Areas (ESHAs) per the CCA, and habitat values contained within an ESHA must be protected against significant disruption. The proposed project could conflict with a number of policies that have been adopted to protect sensitive habitat or animal species. If unmitigated, potential conflicts with policies presented in the Analysis of Relevant Plans and Policies Land Use and Planning Policy Matrix (Appendix G) could result in significant impacts on the environment. Potential impacts on ESHAs would be reduced with Mitigation Measures (MM) BR-2, MM BR-4, and MM BR-6, outlined in Section 5.4, “Biological Resources.”

As previously discussed, per General Order No. 131-D, CPUC projects are exempt from local land use regulations and discretionary permitting. Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. In general, most of the relevant policies address protecting natural resources from conflicts that may arise from encroachment and incompatible land uses. In the main, most local planning documents support the undergrounding of utilities and removal of infrastructure from sensitive environmental areas.

Environmental plans and policies are those, like the San Diego MSCP, LCP, and CCA that directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve the characteristics of the area’s physical environment. While implementation of the proposed project may result in temporary construction-related impacts and would require work within sensitive environmental areas, SDG&E would implement mitigation measures to reduce potential environmental impacts and thus would not lead to a conflict with local planning documents. Once operational, the electrical network would operate similarly to existing conditions, albeit with infrastructure within San Dieguito Lagoon and Los Peñasquitos Lagoon removed from service. As a result, SDG&E maintenance crews would no longer require access to these environmentally sensitive areas for maintenance.

The proposed project, with mitigation identified in topical sections in this Initial Study, would not obviously or substantially conflict with any such adopted environmental plan or policy, and the impact would be less than significant.

Significance: Less than Significant with Mitigation Incorporation.

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

The majority of the project area is located within areas protected under the City of San Diego MSCP. In addition, small portions of the project area within Los Peñasquitos Lagoon and the Torrey Pines State Natural Reserve Extension are located within the area covered by the City of San Diego MHPA. As analyzed in Section 5.4, “Biological Resources,” the applicant shall adhere to **MM BR-2**, which would ensure that all ESAs, including ESHAs, are demarcated to prevent substantial adverse effects, including destruction or degradation of habitat and species associated with project activities involving trampling, water runoff, and sedimentation.

Significance: Less than Significant with Mitigation Incorporation.

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5.11 Mineral Resources

5.11.1 Environmental Setting

The U.S. Geological Survey defines a mineral resource as a concentration of naturally occurring solid, liquid, or gaseous material in or on the earth's crust in such form and amount that economic extraction of a commodity from the concentration is currently or potentially feasible (USGS 1980). Mineral resources include oil and natural gas, as well as metallic and non-metallic deposits.

The U.S. Geological Survey's Mineral Resource Data System maps current and past producers of minerals, prospects, and occurrences of minerals. One historic mine is located within 0.25 miles of the project's TL666D corridor (USGS 2005). The Sorrento Sand Company Deposit is located between the TL666D removal project component and Interstate 15 north of Carmel Valley Road. However, most of this area is developed. No active or inactive mines, mineral occurrences, or mineral prospects are known to exist within the project area. Mines and mineral resource zones in the project vicinity are shown on Figure 5.11-1.

The California Department of Conservation, Division of Mines and Geology, mapped mineral resource zones (MRZs) in the vicinity of the proposed project in its Special Report 153 (DOC 1982). The designated mineral resource zones in the project area are for aggregate resources, and are defined as follows (DOC 1982):

- **MRZ-1:** Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that there is little likelihood for their presence. This zone shall be applied where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is nil or slight.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that there is a high likelihood for their presence. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based upon economic-geologic principles and adequate data demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3:** Areas containing mineral deposits, the significance of which cannot be evaluated from available data.
- **MRZ-4:** Areas where available information is inadequate for assignment to any other mineral resource zone. (DOC 1982)

Areas designated MRZ-2 (where mineral resources are present) are located beneath a small segment of the TL666D corridor, the Torrey Pines Fly Yard, one steel pole that would be topped, one stringing site, and one temporary footpath (Figure 5.11-1). The general plans for the cities of Del Mar and San Diego do not identify locally important mineral resources. The regional plans prepared for the North County Sub-region and the San Diego Association of Governments do not identify locally important mineral resources. The San Diego County general plan does not identify locally important mineral resources. The

City of San Diego and the San Diego County general plans identify only the MRZs shown on Figure 5.11-1 (City of San Diego 2008, San Diego County 2011).

The project area is not located in a region of active oil exploration and production. No active oil or gas wells are located within the project area, although one inactive and one plugged/abandoned well are located approximately 1.7 miles east of the center of the TL666D utility corridor (DOC 2017). In addition, none of the project components would be located within the boundaries of an oil and gas field (DOC 2001).

5.11.2 Regulatory Setting

Federal

Mining and Mineral Policy Act of 1970

This act declared that the federal government policy is to encourage private enterprise in the development of a sound and stable domestic mineral industry and orderly and economic development of mineral resources, research, and reclamation methods. According to the applicable California Environmental Quality Act criteria, the proposed project may create a significant impact where it conflicts with the goals of the Mining and Mineral Policy Act of 1970.

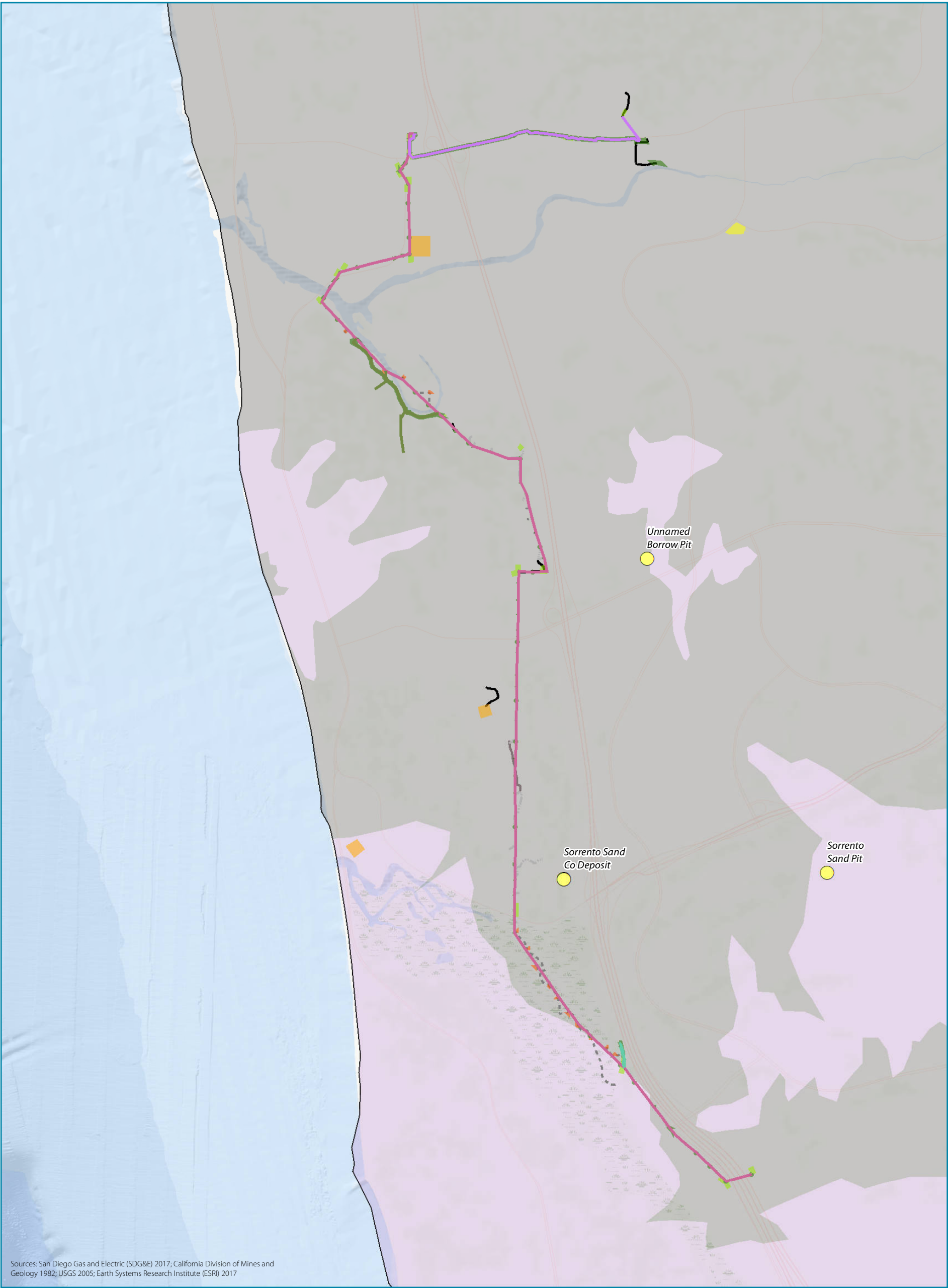
State

California Surface Mining and Reclamation Act

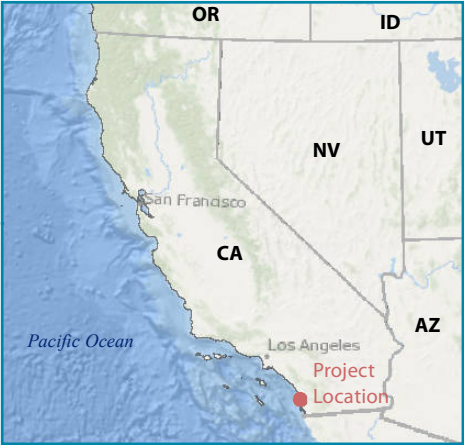
The State Mining and Geology Board implements state policy and regulations for reclamation of mined lands and conservation of mineral resources. The Surface Mining and Reclamation Act of 1975 (Public Resources Code Sections 2710–2796) set forth these policies in the California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1, and requires local governments within California to regulate mining operations and to develop planning policies that balance mineral production with maintenance of environmental quality. The California Geological Survey, under the authority of the California Surface Mining and Reclamation Act, maps mineral resource zones. The proposed project may have a significant impact if it prevents recovery of mineral resources as mapped under the authority of the California Surface Mining and Reclamation Act.

California Division of Oil, Gas and Geothermal Resources

Public Resources Code Section 3106 mandates the supervision of drilling, operation, maintenance, and abandonment of oil wells for the purpose of preventing damage to life, health, property, and natural resources; damage to underground and surface waters suitable for irrigation or domestic use; loss of oil, gas, or reservoir energy; and damage to oil and gas deposits by infiltrating water and other causes. In addition, the California Division of Oil, Gas and Geothermal Resources regulates drilling, production, injection, and gas storage operations in accordance with California Code of Regulations Title 14, Chapter 4, Subchapter 1. This division also maps oil and gas wells and oil and gas fields in the state. The proposed project may have a significant impact if it prevents the extraction of oil and gas.



Sources: San Diego Gas and Electric (SDG&E) 2017; California Division of Mines and Geology 1982; USGS 2005; Earth Systems Research Institute (ESRI) 2017



- | | |
|-----------------------------|------------------------------|
| Proposed Project Components | Existing Access Road |
| C510 Conversion | Existing Footpath |
| C738 Conversion | Existing Footpath/ATV Access |
| TL666D Removal | Temporary Footpath |
| TL674A Reconfiguration | Mine Locations |
| Drop Zone | Mineral Resource Zone |
| Fly Yard | MRZ-2 |
| Staging Yard | MRZ-3 |
| Stringing Site | |
| Work Area | |

Figure 5.11-1
Mines and Mineral
Resource Zones in the
Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
San Diego County, California

March 2018

0 0.25 0.5 Miles
0 0.5 1 Kilometers

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Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to mineral resources, this analysis presents local policies, ordinances, and guidelines pertinent to mineral resources within the project area and vicinity for informational purposes.

The relevant planning documents for the city of San Diego and Del Mar do not identify locally important mineral resource recovery sites that would be affected by implementing the proposed project.

5.11.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

The applicant has not incorporated applicant-proposed measures into the proposed project to specifically minimize or avoid impacts on mineral resources.

Significance Criteria

Table 5.11-1 includes the significance criteria from Appendix G of the California Environmental Quality Act Guidelines' mineral resources section to evaluate the environmental impacts of the proposed project.

Table 5.11-1 Mineral Resources Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. 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?

The Torrey Pines Fly Yard, one temporary footpath, one steel pole that would be topped, one stringing site, and a small segment on the TL666D utility corridor are located in areas that the state geologist has designated MRZ-2, meaning there is a high likelihood that mineral resources may be present. The fly yard and footpath are temporary facilities, and no construction of permanent facilities would occur in any area designated as MRZ-2. The project's operation and maintenance activities would not require, preclude, or result in the loss of availability of a known mineral resource; thus, there would be no impact under this criterion.

Significance: No Impact

b. 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?

The relevant planning documents for the City of San Diego and Del Mar do not identify locally important mineral resource recovery sites that would be affected by implementing the proposed project. Thus, no impact would occur under this criterion.

Significance: No Impact

References

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5.12 Noise

5.12.1 Environmental Setting

Fundamentals of Noise and Vibration

Noise is defined as unwanted and objectionable sound. Noise is measured in terms of sound-pressure level using units called decibels (dB). The most common system used by regulatory bodies for noise measurement is the A-weighted decibel scale. The A-weighted decibel (dBA) scale measures sound as an approximation of how a person perceives or hears it. Since the range of intensities that the human ear can detect is large, sound is measured using a logarithmic scale. The scale is based on multiples of 10 and each interval of 10 decibels indicates a sound energy 10 times greater, which is perceived by the human ear roughly twice as loud. Table 5.12-1 contains definitions of acoustical terms used in this analysis.

Table 5.12-1 Definition of Acoustical Terms

Term	Definition
Noise	Unwanted sound, which occurs as a rapid fluctuation of air pressure above and below the atmospheric pressure. There are two important characteristics of noise: frequency and loudness. The number of pressure variations per second is called the frequency of sound and is measured in Hertz. The higher the frequency, the more high-pitched a sound is perceived to be. Loudness is measured in decibels, which are defined herein.
Decibel	Noise is measured in terms of sound-pressure level using units called decibels (dB). Since the range of intensities that the human ear can detect is large, the logarithmic scale is based on multiples of 10. Each interval of 10 dB indicates a sound energy 10 times greater. Each interval is perceived by the human ear as being roughly twice as loud.
A-weighted decibel (dBA)	The most common system used by regulatory bodies for noise measurement is the A-weighted decibel (dBA) scale. This scale measures sound as an approximate to how a person perceives or hears sound. A-weighted sound levels are typically measured or presented as the equivalent sound pressure level (L_{eq}).
Equivalent sound pressure level (L_{eq})	A single value of sound level for any desired duration, which includes all of the time-varying sound energy in the measurement period. Sound levels are usually best represented by an equivalent level over a given time period (L_{eq}) or by an average level occurring over a 24-hour day-night period (L_{dn}).
Statistical noise measurement	Statistical methods are used to capture the dynamics of a changing acoustical environment. Statistical measurements are typically denoted by L_{xx} , where xx represents the percentage of time the sound level is exceeded. For example, L_{90} represents the noise level exceeded during 90 percent of the measurement period. Similarly, L_{10} represents the noise level exceeded for 10 percent of the measurement period.
Day-night average sound level (L_{dn}) noise level	The L_{dn} , or day-night average sound level (DNL), is equal to the 24-hour A-weighted equivalent sound level that is weighted to account for differences in noise levels and the perception of noise during nighttime hours (10 p.m. to 7 a.m.). Most household noise also decreases at night, and exterior noise becomes more noticeable.

Source: EPA 1978.

Key:

dB = decibel

dBA = A-weighted decibel

DNL = day-night average sound level

L_{dn} = day-night average sound level

L_{eq} = equivalent sound pressure level

Sensitivity to noise is subjective and varies from person to person, with the particular setting, and with the time of day. Sensitivity to noise typically increases during the evening and nighttime hours, when excessive noise can interfere with at-home activities and the ability to sleep. To account for these

day/evening/night differences in sensitivity, 24-hour descriptors have been developed that incorporate artificial noise penalties, which are added to quiet-time noise events.

The day/night average sound level (L_{dn}) is a measure of the cumulative noise exposure in a community, with a 10-dB penalty applied to nighttime (i.e., 10:00 p.m. to 7:00 a.m.) noise levels. A similar 24-hour metric is the community noise equivalent level (CNEL), which extends the sensitivity adjustment beyond the L_{dn} by also applying a 5-dB addition to noise levels in the evening hours (7:00 p.m. to 10:00 p.m.).

Ambient Noise Levels in the Project Area

Noise levels in communities usually relate to the intensity of nearby human activity. Communities may be affected by noise from a variety of stationary and mobile sources that generate noise of varying intensities. Ambient noise levels are generally considered to be low at levels below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. In wilderness areas, the L_{dn} noise levels can be below 35 dBA. In small towns or wooded and lightly used residential areas, the L_{dn} is more likely to be around 50 to 60 dBA.

The general human response to changes in noise levels that are similar in frequency content (e.g., increases in continuous equivalent sound pressure level [L_{eq}] for traffic) are summarized as follows:

- A 3-dB change in sound level is considered barely perceptible.
- A 5-dB change in sound level would typically be noticeable.
- A 10-dB change in sound level would represent a doubling in loudness and would likely be perceived as noisy.

The existing overhead utility lines associated with the proposed project are within the cities of San Diego and Del Mar. Ambient noise sources in each jurisdiction are described as follows:

- **City of San Diego:** characterized as a developed and urbanized city. Motor vehicle traffic on interstate freeways, state highways, and local major roads are the most prevalent noise sources. Other contributors to the city's noise environment are aircraft noise, rail traffic, and industrial and commercial activities (City of San Diego 2015).
- **City of Del Mar:** characterized as a small residential community in the coastal fringe of San Diego. Mobile sources of noise from trains and motor vehicle traffic on Camino del Mar are the most prevalent noise sources. Noise from trains is periodic, and noise from motor vehicle traffic is relatively constant (City of Del Mar 1976).

The typical noise level in agricultural and rural-residential areas is approximately 30 dBA. The typical noise level in urban areas is between 60 and 70 dBA (Caltrans 2013).

Attenuation of Noise

A person's distance from a noise source and presence of physical barriers affects how noise levels attenuate (decrease). Transportation noise sources tend to be arranged linearly, such that roadway traffic noise attenuates at a rate of 3 to 4.5 dBA per doubling of distance from the source. Point sources of noise,

including stationary, fixed, and idle mobile sources, like idling vehicles or construction equipment, may attenuate at rates of 6.0 dBA to 7.5 dBA per doubling of distance from the source, depending on the type of intervening ground surface and vegetation (HUD 1985). Meaningful attenuation of noise levels can also be accomplished by “shielding” or by providing a barrier, which may be in the form of an intervening structure or terrain. Buildings adjacent a roadway may shield people from traffic noise, with closely spaced buildings providing about 5.0 dBA of reduction (Caltrans 2013).

Vibration

Vibration is a change in pressure that at certain levels may be perceived as a nuisance. As with noise, vibration can be described by its amplitude and frequency. Amplitude may be characterized by displacement, velocity, and/or acceleration. Frequency of vibration can also change human perception—usually the longer the event and the higher the frequency, the more adverse the effect on human response (Caltrans 2013). Vibration can be felt outdoors, but the perceived intensity of vibration impacts is much greater indoors due to the shaking of structures. Human response to vibration is difficult to quantify, and vibration can be perceived at levels that are below those required to produce any damage on structures. Typically, perception and annoyance are higher for transient rather than for continuous vibration. Typical background vibration from common sources, like roads, in a residential area is 50 vibration decibels (VdB), 15 VdB below the human threshold of perception (FTA 2006).

Sensitive Receptors in the Project Area

Noise- and vibration-sensitive receptors are land uses where an excessive amount of noise would interfere with normal activities. For noise, sensitive receptors may entail primarily residences, hospitals, religious congregations, schools and libraries, nature and wildlife preserves, and parks. In addition to these land uses, research laboratories are also sensitive to groundborne vibration. For the purposes of this analysis, the project study area for sensitive receptors is 1,000 feet from all project components. Within this 1,000-foot sensitive receptor area are ~~three~~ five schools, 14 residences, ~~and~~ eight parks, and one private educational facility. No churches, religious organizations or known research laboratories are present within 1,000 feet of a project component. Figure 5.12-1 shows all sensitive receptors within 1,000 feet of the project area and highlights the nearest school, Del Mar Hills Elementary School (approximately 27 feet), and nearest residence (approximately 35 feet). Table 5.12-2 lists all noise-sensitive receptors within 1,000 feet of the proposed project.

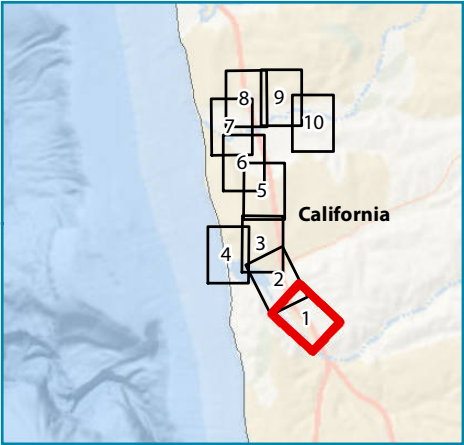
Table 5.12-2 Noise-Sensitive Receptors within 1,000 Feet of Project Components

Project Component/Activity	Nearest Sensitive Receptor (feet)	Receptor
TL674A Reconfiguration		
New 69 kV Underground TL674A	355	Residence
Overhead Line to be Removed 69 kV TL674A	115	Residence
<u>Work Area – TL674A (WA-2)</u>	<u>283</u>	<u>Solano Santa Fe Elementary School</u>
<u>TL674A Underground Work Area</u>	<u>75</u>	<u>Therapeutic Learning Center</u>

Table 5.12-2 Noise-Sensitive Receptors within 1,000 Feet of Project Components

Project Component/Activity	Nearest Sensitive Receptor (feet)	Receptor
TL666D Removal		
Drop Zone EL666D	107	Residence
Overhead 69 kV TL666D to be removed	Many features overlap	Peñasquitos Lagoon Open Space
Overhead 69 kV TL666D to be removed	Many features overlap	Los Peñasquitos Marsh Nature Preserve
Stringing Site TL666D SS-15	35	Residence
Stringing Site TL666D SS-16	35	Residence
Stringing Site TL666D SS-17	55	Residence
Stringing Site TL666D SS-18	52	Residence
Stringing Site TL666D SS-2	11	Residences
Stringing Site TL666D SS-25	82	Residence
Stringing Site TL674A SS-28	295	Residence
Work Area TL666D (WA-11)	822	Surf and Turf Recreational Park
Work Area TL666D (WA-44)	41	Residence
Work Area TL666D (WA-5)	79	Residence
Work Area TL666D (WA-59)	27	Del Mar Hills Elementary School
Work Area TL666D (WA-67)	175	Del Mar Nursery School
Work Area TL666D (WA-100)	400	Brighter Future Preschool
Work Area TL666D (WA-102)	400	Child Development Center
C510 Conversion		
Existing 12kV Overhead	42	Residence
New 12 kV Underground C510	91	Residence
C738 Conversion		
Underground Work Area C738	445	Shaw Valley Open Space
Del Mar Substation		
Circuit Breaker Removal and Replacement	228	Therapeutic Learning Center
All		
Del Mar Heights Fly Yard	361	Del Mar Heights Elementary School
Pumpkin Patch Staging Yard	121	Fairbanks Ranch Country Club
Pumpkin Patch Staging Yard	123	Carmel Valley Open Space
Pumpkin Patch Staging Yard	145	Residence
Torrey Pines Fly Yard	102	Torrey Pines State Reserve
Torrey Pines Fly Yard	363	Torrey Pines State Beach
Torrey Pines Fly Yard	Features overlap	San Jacinto Wilderness

Key:
kV = kilovolt

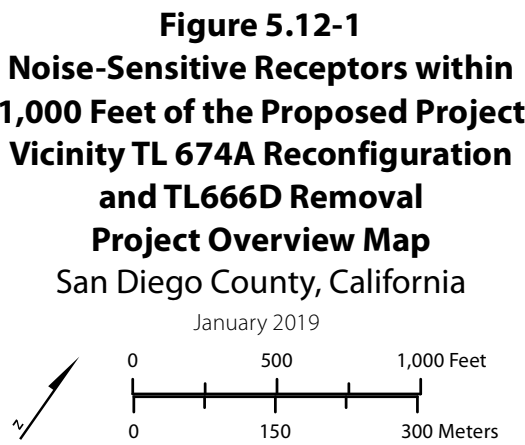
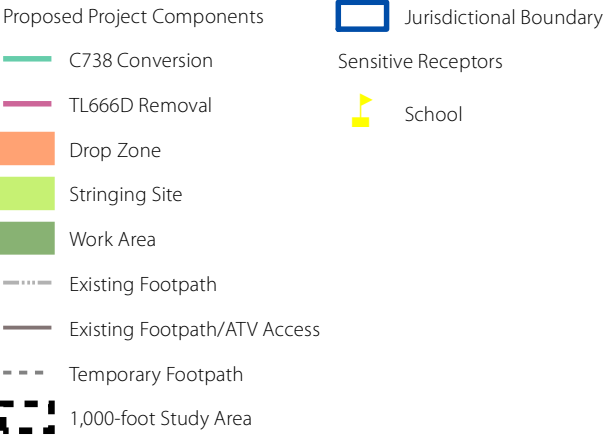
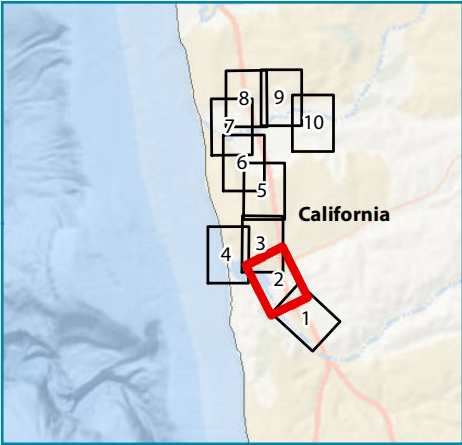
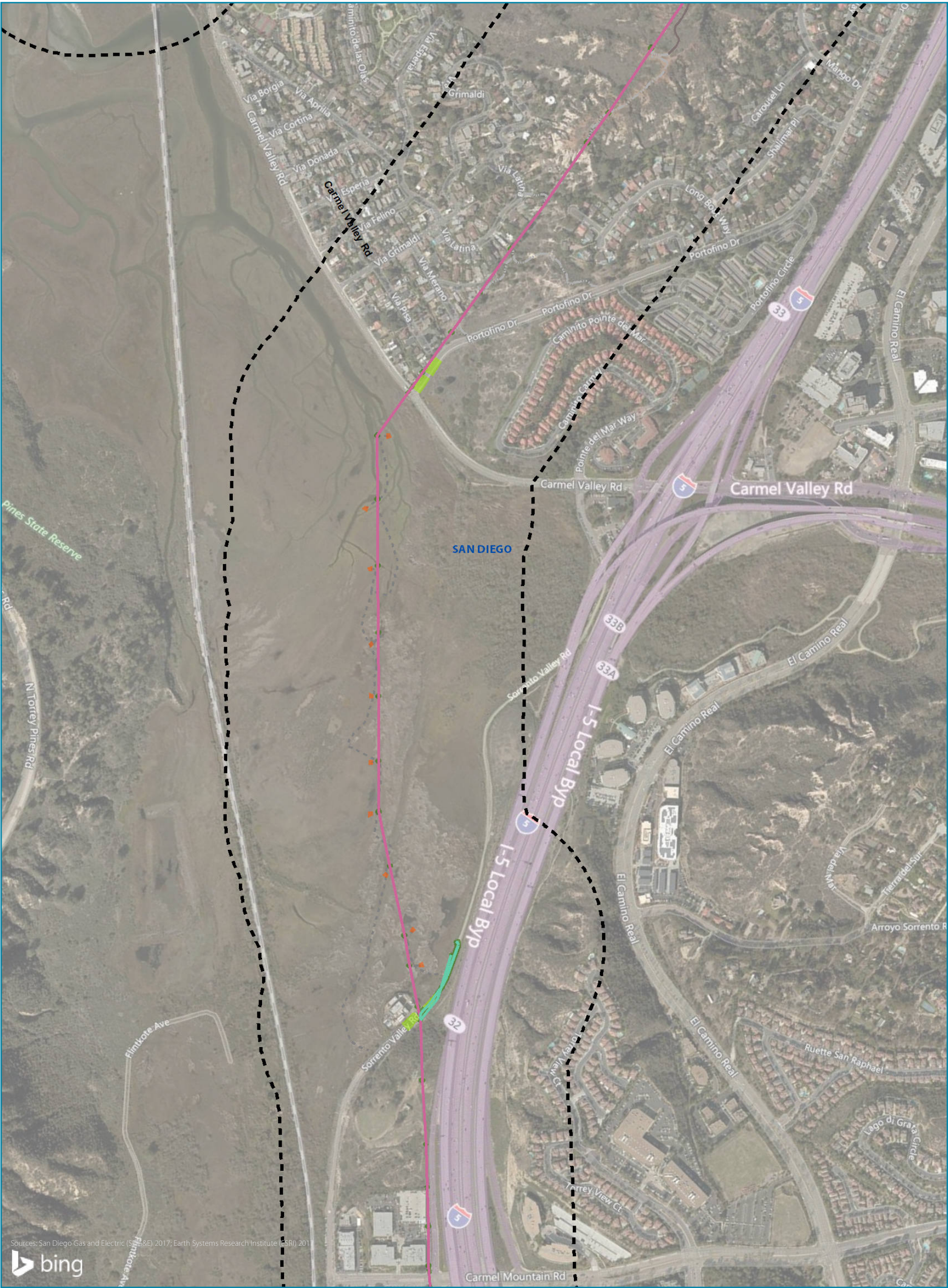


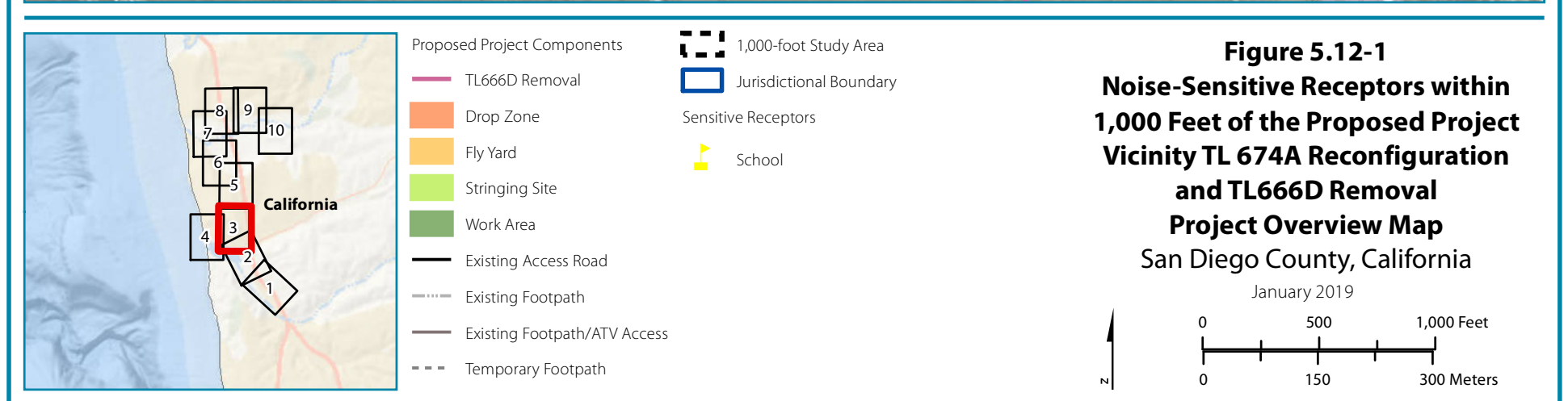
- | Proposed Project Components | Sensitive Receptors |
|-----------------------------|---------------------|
| C738 Conversion | School |
| TL666D Removal | |
| Drop Zone | |
| Stringing Site | |
| Work Area | |
| Temporary Footpath | |
| 1,000-foot Study Area | |
| Jurisdictional Boundary | |

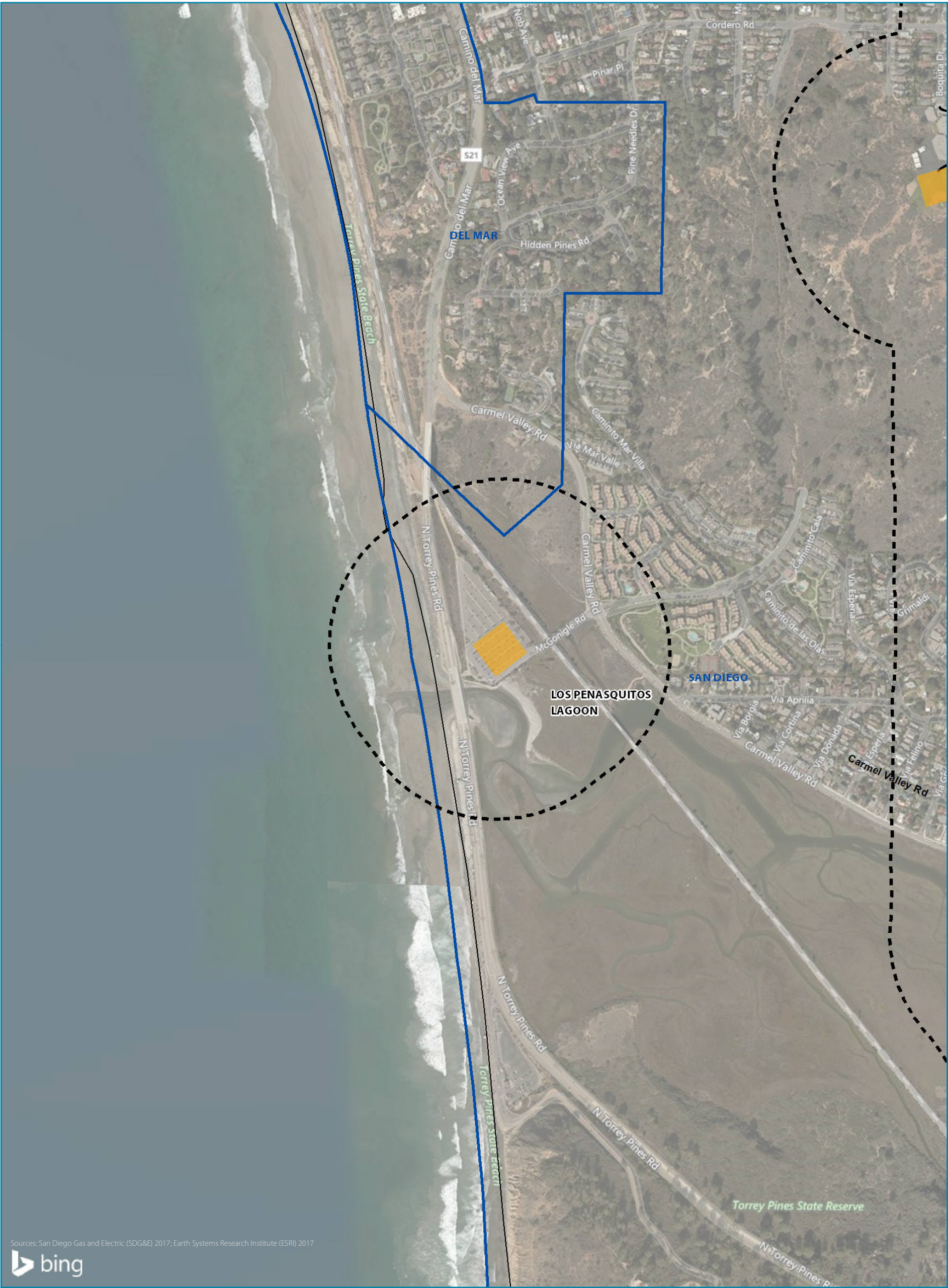
Figure 5.12-1
Noise-Sensitive Receptors within
1,000 Feet of the Proposed Project
Vicinity TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019

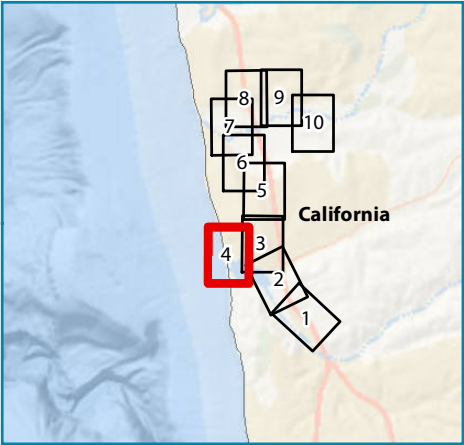








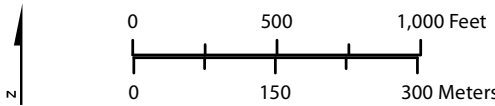
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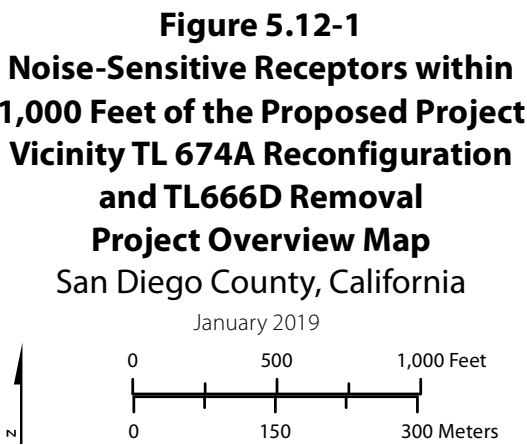
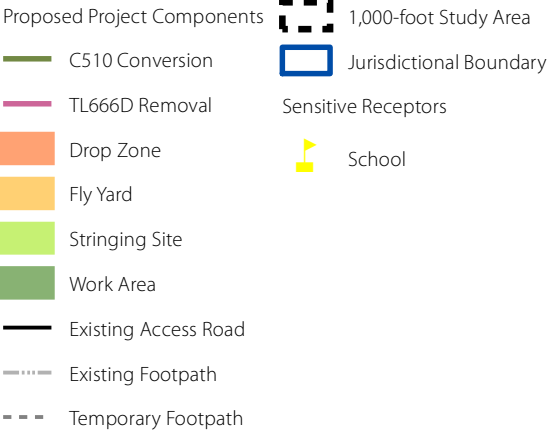
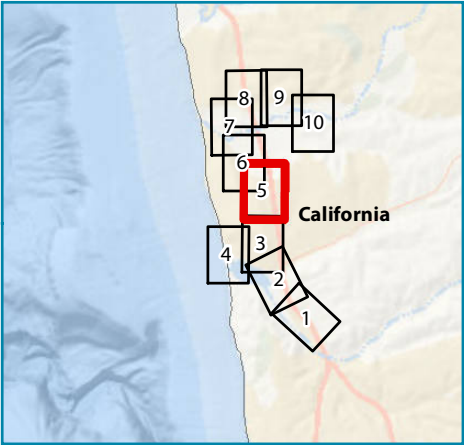
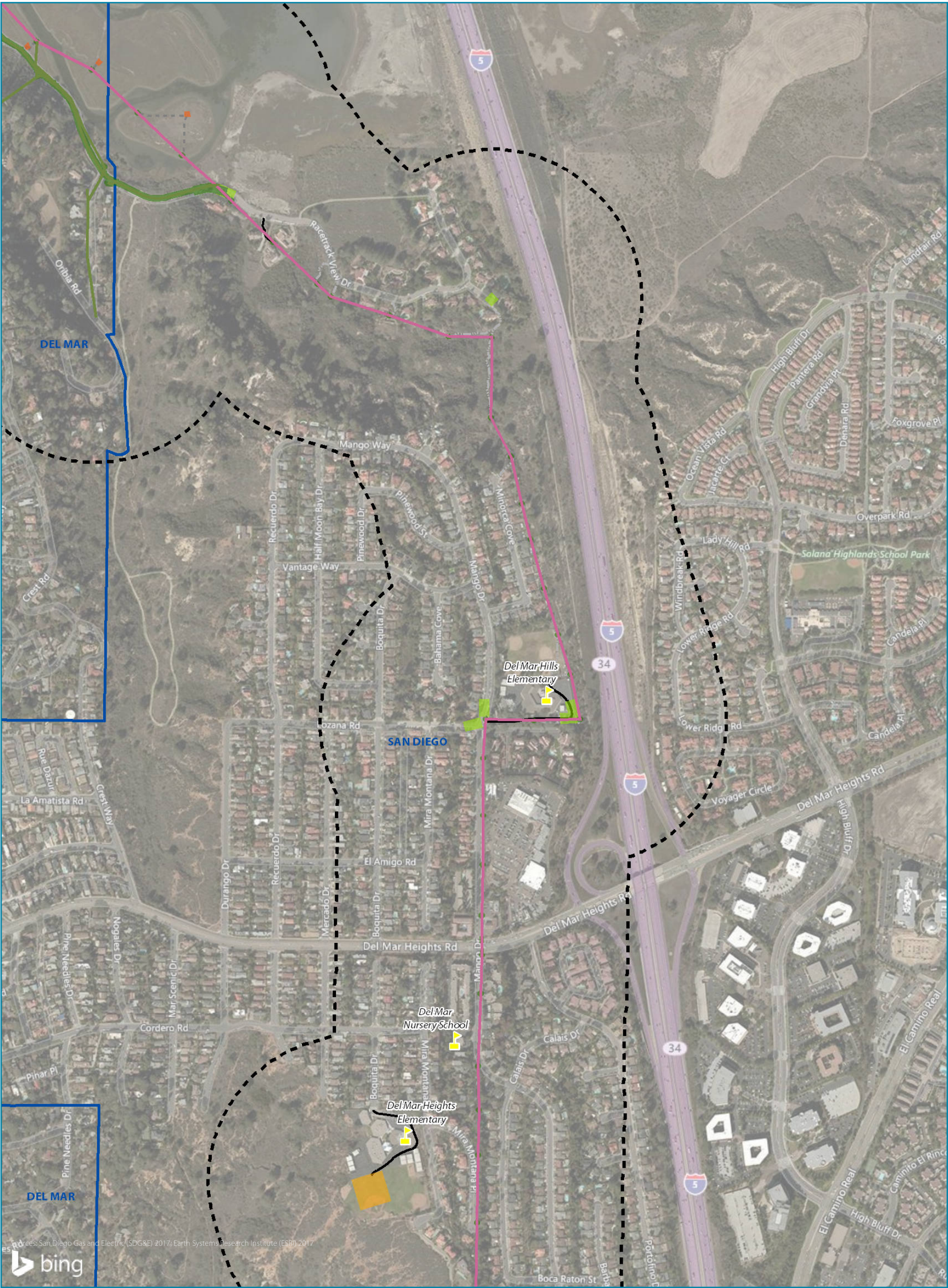


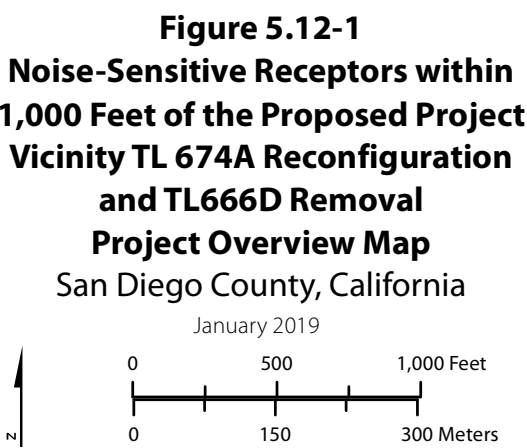
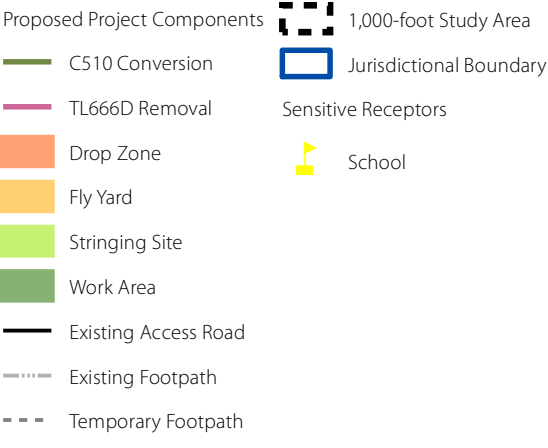
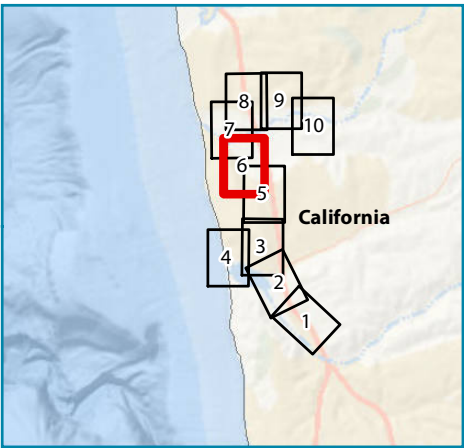
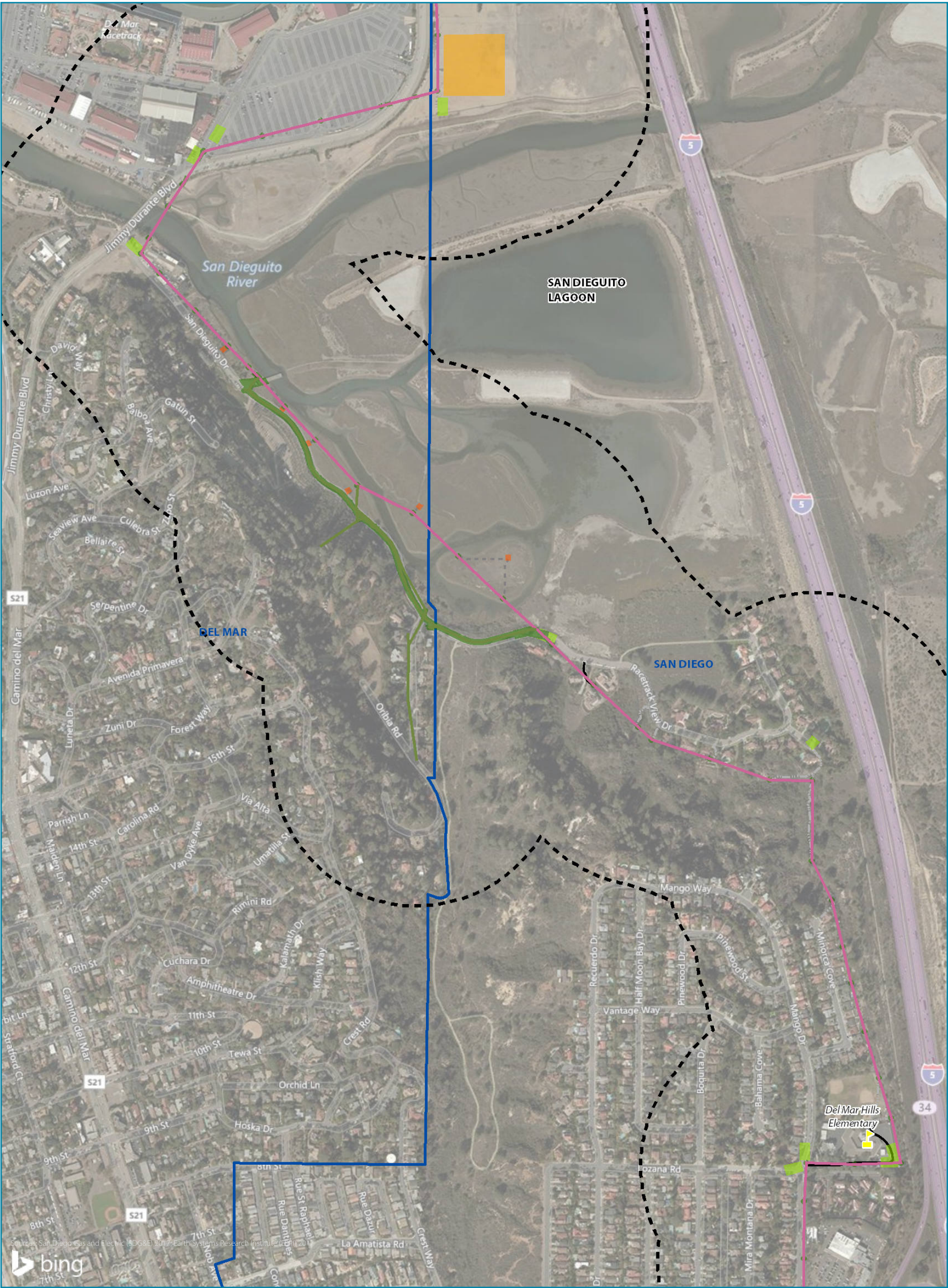
- Fly Yard
- Existing Access Road
- 1,000-foot Study Area
- Jurisdictional Boundary
- Sensitive Receptors
- School

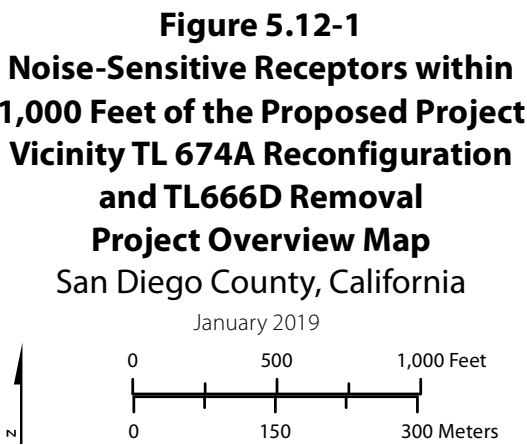
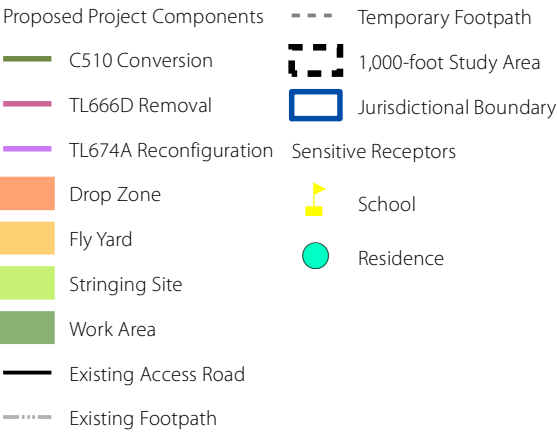
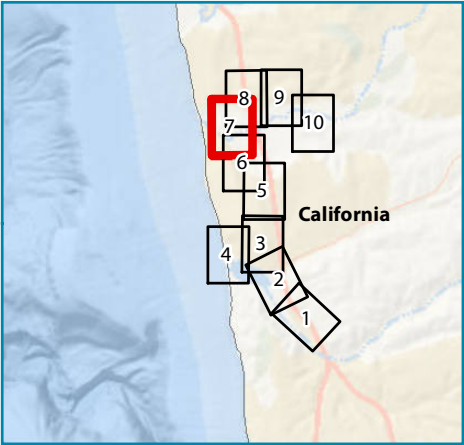
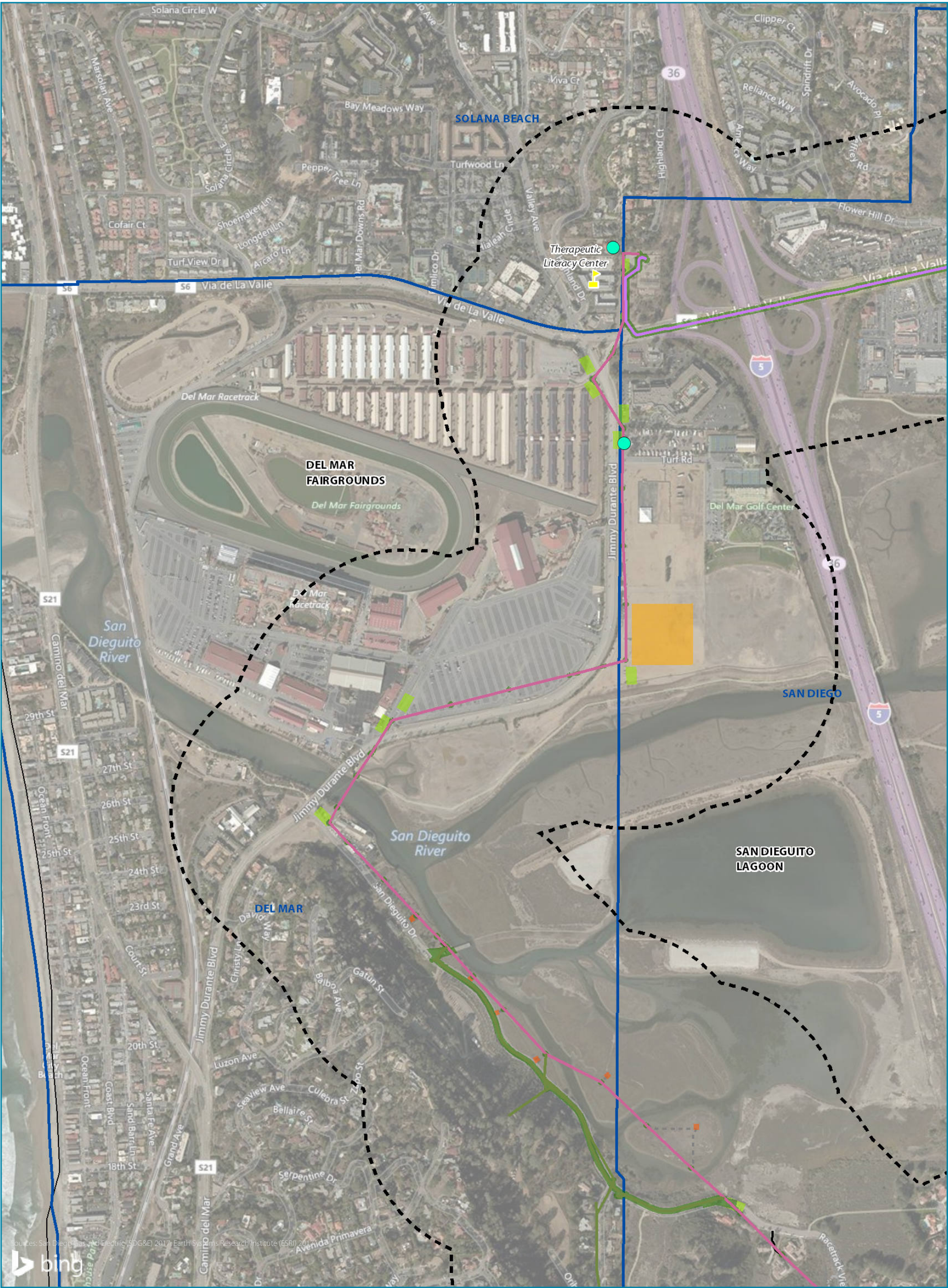
Figure 5.12-1
Noise-Sensitive Receptors within
1,000 Feet of the Proposed Project
Vicinity TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

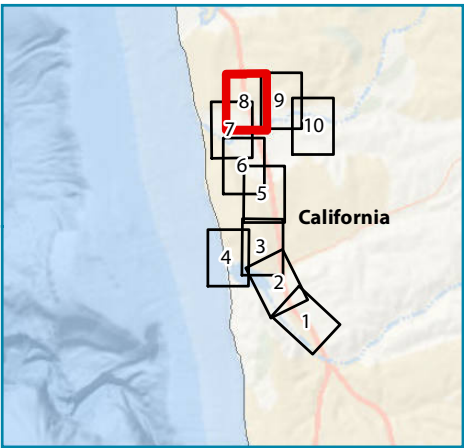
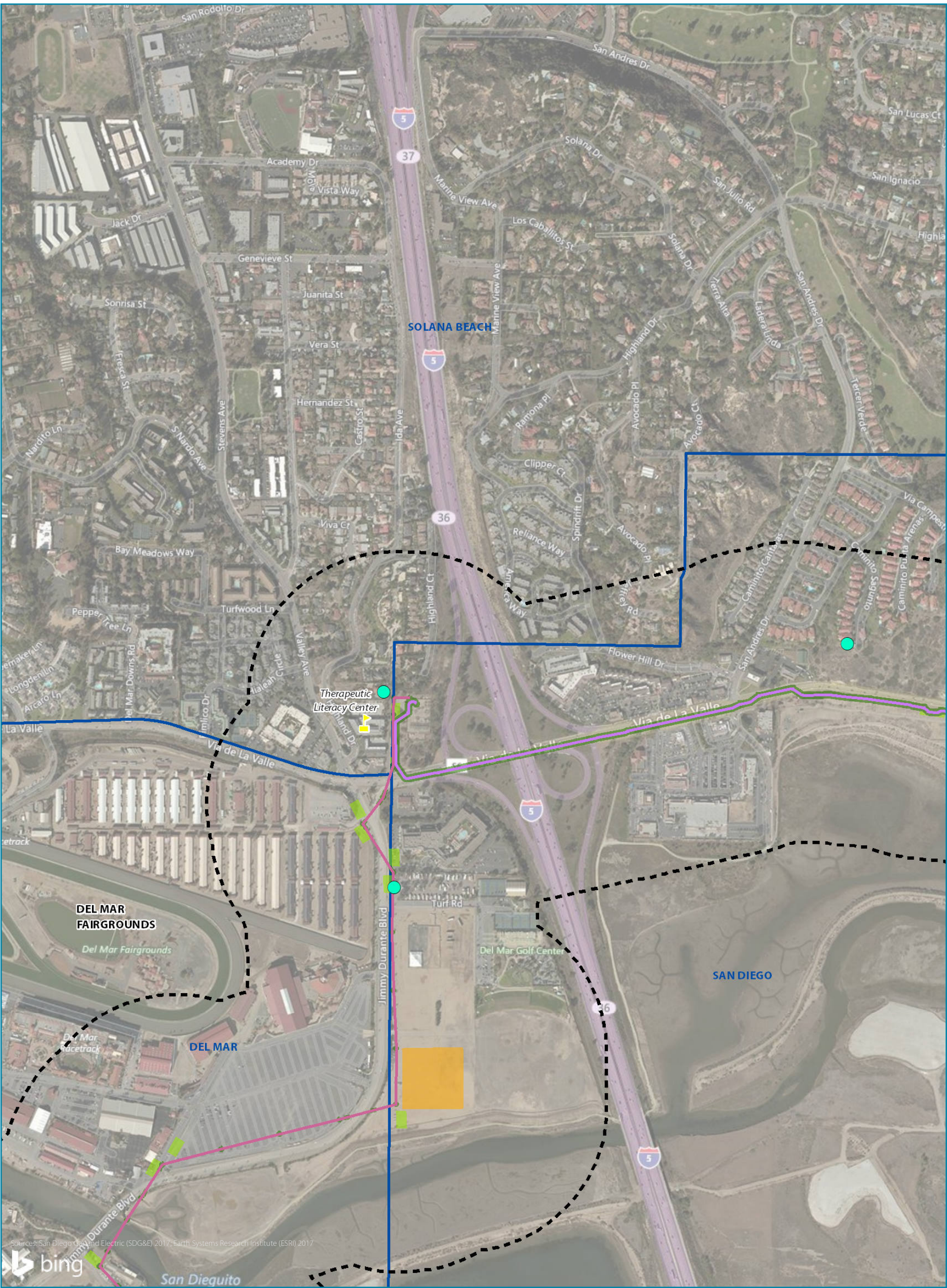
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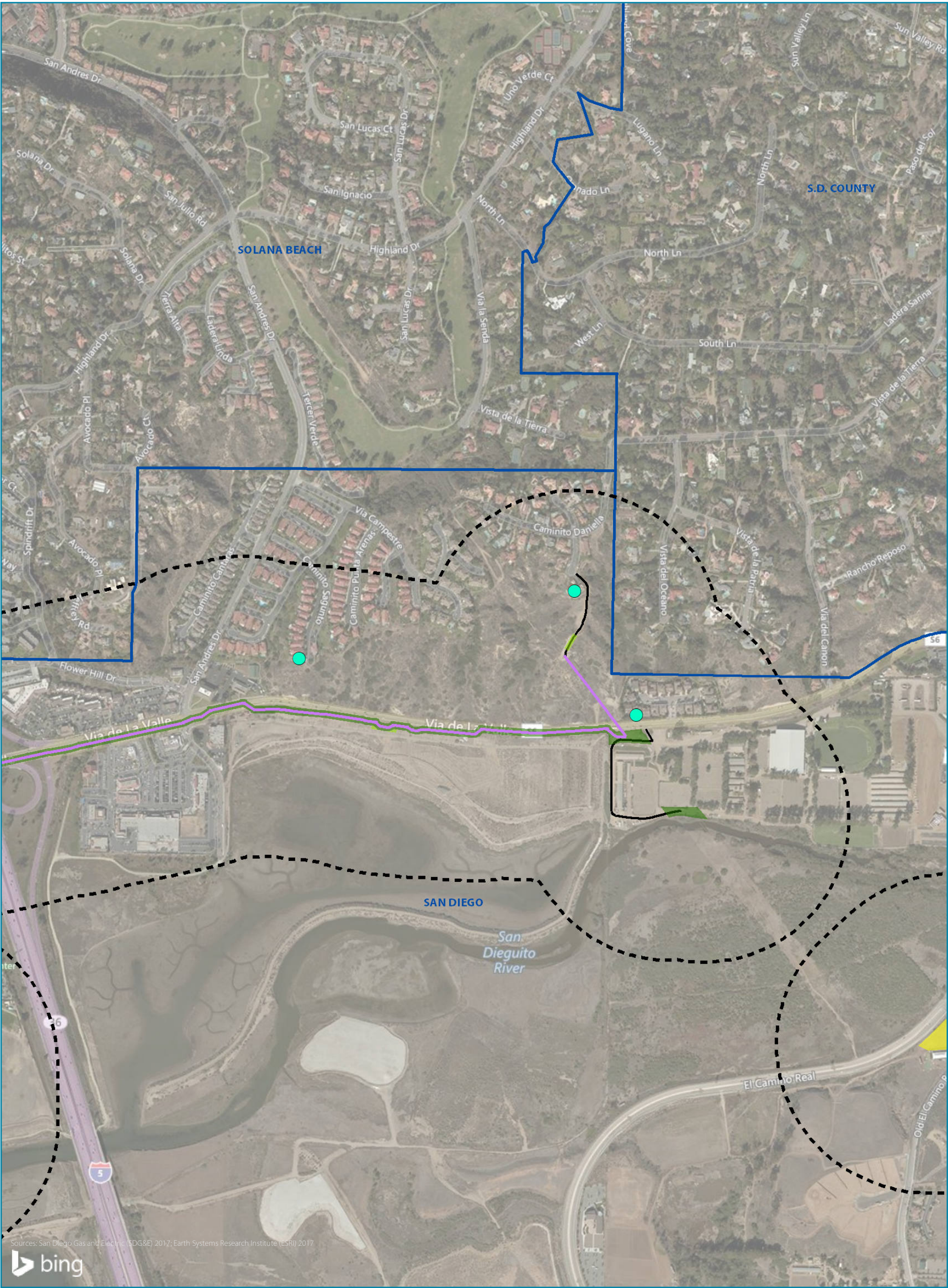




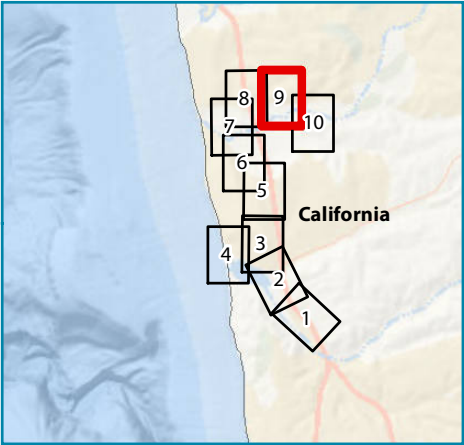
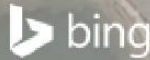
- | Proposed Project Components | Sensitive Receptors |
|-----------------------------|---------------------|
| TL666D Removal | School |
| TL674A Reconfiguration | Residence |
| Fly Yard | |
| Stringing Site | |
| Work Area | |
| Temporary Footpath | |
| 1,000-foot Study Area | |
| Jurisdictional Boundary | |

Figure 5.12-1
Noise-Sensitive Receptors within
1,000 Feet of the Proposed Project
Vicinity TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California
January 2019

0 500 1,000 Feet
0 150 300 Meters



Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017



Proposed Project Components

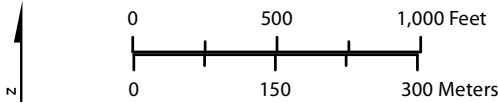
- TL674A Reconfiguration
- Staging Yard
- Stringing Site
- Work Area
- Existing Access Road
- 1,000-foot Study Area
- Jurisdictional Boundary

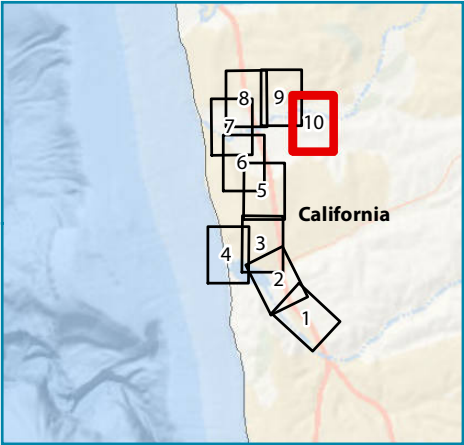
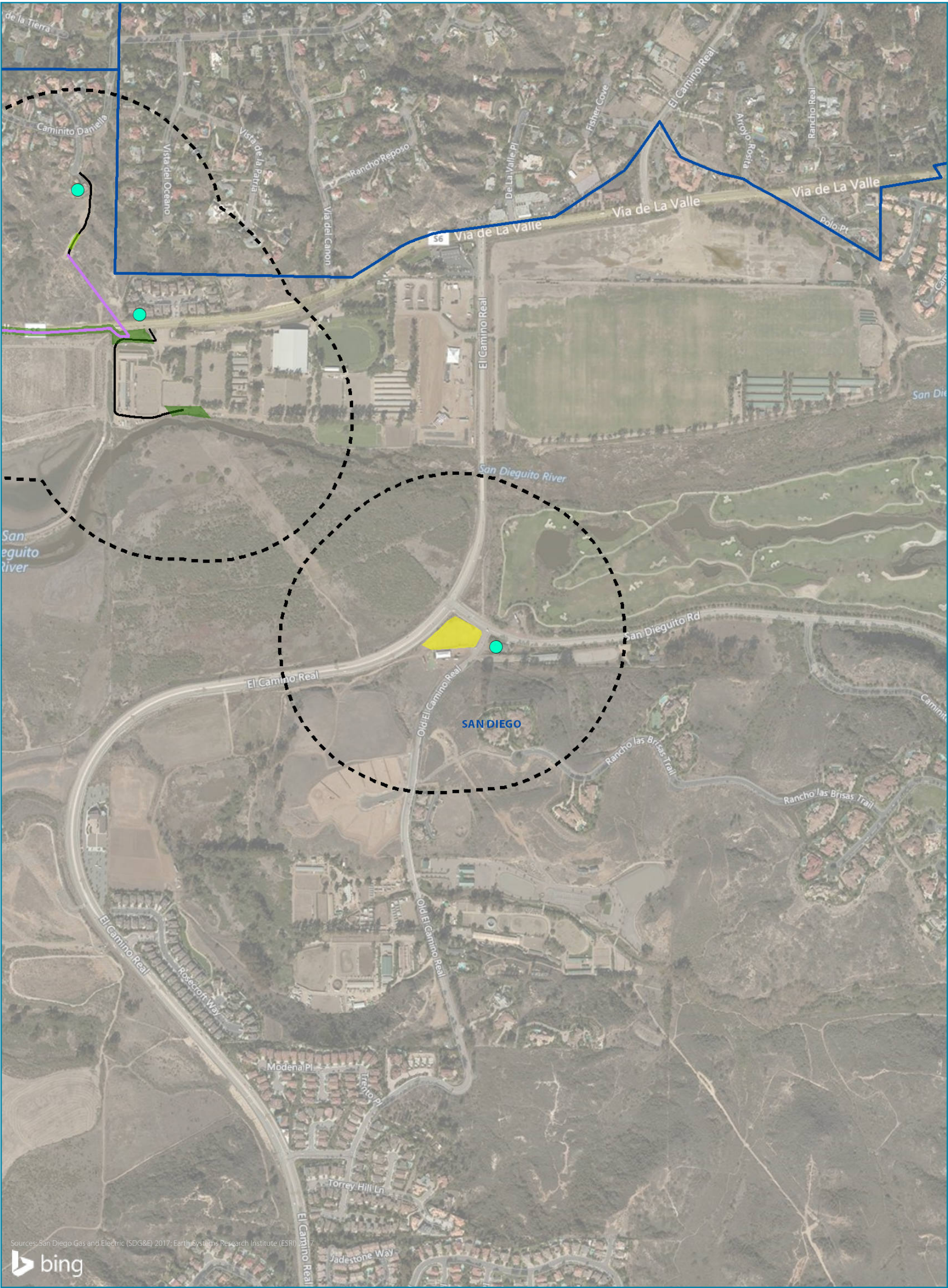
Sensitive Receptors

- School
- Residence

Figure 5.12-1
Noise-Sensitive Receptors within
1,000 Feet of the Proposed Project
Vicinity TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019





- | Proposed Project Components | Sensitive Receptors |
|-----------------------------|---------------------|
| TL674A Reconfiguration | School |
| Staging Yard | Residence |
| Stringing Site | |
| Work Area | |
| Existing Access Road | |
| 1,000-foot Study Area | |
| Jurisdictional Boundary | |

Figure 5.12-1
Noise-Sensitive Receptors within
1,000 Feet of the Proposed Project
Vicinity TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California
January 2019

0 500 1,000 Feet
0 150 300 Meters

5.12.2 Regulatory Setting

Federal

Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual

This manual includes guidelines for construction noise and vibration thresholds that can be used as reference for noise impact analyses. The threshold for daytime construction noise impacts in outdoor areas is 90 dBA L_{eq} . The guidance threshold for construction vibration damage to non-engineered timber and masonry buildings is 0.2 inches per second peak particle velocity (PPV). The threshold for human annoyance (i.e., distinctly perceptible vs. barely perceptible) for groundborne vibration is 75 VdB (FTA 2006). These thresholds are used in the impact analysis in Section 5.12.3, “Environmental Impacts and Assessment.”

Occupational Health and Safety Administration Hearing Conservation Program

This program requires employers to monitor noise exposure levels to accurately identify employees exposed to noise at or above 85 dB averaged over 8 working hours. Workers must be provided hearing protectors if they are exposed to 8-hour time-weighted average noise levels of 85 dB and above (OSHA 2002). The proposed project would expose workers to noise during construction.

State

California Health and Safety Code Sections 1600 to 46080 (California Noise Control Act)

This act declares excessive noise a serious hazard to public health and welfare and acknowledges the continuous and increasing bombardment of noise in urban, suburban, and rural areas. Furthermore, the state must provide an environment for all Californians free from noise that jeopardizes their health or welfare through the control, prevention, and abatement of noise (State of California 1993). The proposed project would expose the public to noise.

California Government Code Section 65302

The State of California requires local governments to perform noise surveys and implement a noise element as part of their General Plans. The state also recommends interior and exterior noise standards by land use category and standards for the compatibility of various land uses and noise levels (State of California 2015). Project construction would be subject to performance-based noise regulations and limitations (e.g., noise ordinances) as established in the municipal code for the cities of San Diego and Del Mar.

Local

California Public Utilities Commission (CPUC) General Order 131-D, Section XIV.B, states that “local jurisdictions acting pursuant to local authority are preempted from regulating electrical power line projects, distribution lines, substations or electrical facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.”

San Diego Municipal Code, Noise Abatement and Control

The City of San Diego regulates noise to promote public health, comfort, and convenience. It is unlawful for any person to cause noise by any means to the extent that the 1-hour average sound level exceeds the applicable limit given in the following table, at any location in the city of San Diego on or beyond the boundaries of the property on which the noise is produced. The following provisions for construction are relevant to the proposed project, and Table 5.12-3 lists the City of San Diego's sound level limits:

Article 9.5 Section 59.5.0404 of the City of San Diego Municipal Code dictates that except for emergency work, construction equipment shall not be operated between 7 p.m. and 7 a.m., or on Sundays or holidays. Construction equipment operating within approved daytime hours (7 a.m. to 7 p.m.) may not exceed an average sound level of 75 dBA for the 12-hour period, as measured from the property boundary where the noise source is located, or on a property occupied by receptors.

Table 5.12-3 City of San Diego Sound Level Limits in Decibels (dBA)

Zone	Time	Sound Level Limits (dBA) ^(a)
Single Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
Multi-Family Residential ^(b)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
All other residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
Industrial or Agriculture	Anytime	75

Source: City of San Diego 2017

Notes:

^(a) One-hour average

^(b) Up to a maximum density of 1 unit per 2,000 sq. ft. of lot area

City of Del Mar Community Plan

The City of Del Mar Community Plan references noise in the context of reducing the level of noise created by major transportation routes in the community, but does not have policies specific to construction activities (City of Del Mar 1976).

City of Del Mar Municipal Code

Del Mar’s Municipal Code addresses noise in Chapter 9.20, Noise Regulations. Table 5.12-4, lists the city’s general sound level limits, which would apply to construction noise in Del Mar.

Table 5.12-4 City of Del Mar Sound Level Limits in Decibels

Zone ^(a)	Time of Day	Sound Level (dBA) ^(b)
generally residential, residential-mixed and open space overlay zoning categories	7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	50 40
generally commercial (professional, visitor, residential commercial, beach commercial) zoning categories	7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	60 50
rail corridor	7 a.m. to 10 p.m. 10 p.m. to 7 a.m.	60 55

Source: City of Del Mar Municipal Code, Ch. 9.20

Notes:

^(a) The municipal code establishes sound level limits that apply to individual zoning districts; this table presents a simplified version of the applicable limitations grouped by land use category. Please refer to Chapter 9.20 of the Municipal Code for specific limitations by zoning district.

^(b) One-hour average

In accordance with the City of Del Mar Municipal Code, construction activities may not cause an hourly average sound level greater than 75 dBA on property zoned or used for residential purposes, and shall not be performed:

- On Sundays or city holidays,
- Before 9:00 a.m. or after 7:00 p.m. on Saturday, or
- Before 7:00 a.m. or after 7:00 p.m. on Monday through Friday.

The municipal code permits individuals to perform construction work on their own property, provided such construction activity is not carried on for profit or livelihood, between the hours of 10:00 a.m. and 5:00 p.m. on Sundays and city holidays (City of Del Mar 2017).

5.12.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

The applicant has not incorporated applicant-proposed measures (APMs) into the proposed project to specifically minimize or avoid noise-related impacts. **APM PS-01**, included in Section 5.14, “Public Services” addresses project construction activities that have “the potential to impact schools... in an effort to avoid major school events and to minimize any disruption to learning...” This APM includes actions by the applicant to reduce or avoid construction-related noise by coordinating with school officials to “conduct construction activities outside of the scheduled school year, during seasonal breaks, outside of peak drop-off and pick-up hours for the standard school day, at night, or during weekends.” A list of all project APMs is included in Table 4-9 in Section 4.0, “Project Description.”

Significance Criteria

Table 5.12-5 includes the significance criteria from Appendix G of the CEQA Guidelines' noise section to evaluate the environmental impacts of the proposed project.

Table 5.12-5 Noise Checklist

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

Equipment that may be used to carry out project construction activities would be similar to equipment used in most public works projects. Table 5.12-6 identifies 20 of the most commonly used types of equipment. Noise levels are measured in decibels at a reference distance of 50 feet from the source. Noise levels are conservatively presented, because the reported outputs assume that no equipment muffling, shielding/baffling, or other means of noise reduction is reflected in the data. Muffling, shielding/baffling, or other noise reduction techniques could reduce the level of noise from its source to receptor.

Construction work would occur at specific work areas, proceeding from one location to the next within one of the four utility corridors where specific construction activities have been identified. Construction would also occur at the Del Mar Substation site during works associated with circuit breaker removal and replacement. Each work area is considered separate to ensure that noise-generating characteristics are captured in the evaluation of potential construction noise impacts.

Table 5.12-6 Typical Construction Equipment Noise Levels

Equipment Type	Maximum Noise Level at 50 feet (dBA)
Concrete Saw	90
Mower	88
Drill Rig/Truck-Mounted Augur	85
Grader	85
Impact Wrench	85
Jackhammer	85
Vacuum Truck	85
Dump Truck, Flatbed Truck	84
Crane	81
Excavator	81
Rock Drill/Rock-Drilling Equipment	81
Air Compressor	80
Backhoe	80
Forklift	80
Haul/Dump Truck	80
Water Truck	80
Wire-pulling Machine	80
Loader	79
Paver	77
Aerial Bucket Truck	75
Portable Generator	73

Source: SDG&E 2017

The ~~three~~ four distinctive groups of activities involve the use of mechanical tools to facilitate (1) construction and removal of overhead power lines and infrastructure; (2) converting and reconfiguring existing overhead circuitry to an underground configuration; (3) removing and replacing a circuit breaker at the Del Mar Substation; and (3 ~~4~~) noise-generating activities associated with vehicle movements, machinery, and from helicopter operations associated with power pole topping and removal in environmentally sensitive areas. These ~~three~~ four groups of construction activities contain adequate detail to evaluate the proposed project's anticipated construction noise impacts. Table 5.12-7 would be used for overhead power line construction and removal as well as various other tasks at other work sites within project utility corridors

Overhead Power Line Construction and Removal

The proposed project would entail removal of existing overhead conductor, removal and topping of existing power line poles, and installation of new power line poles. Construction at each discrete work site may include vegetation clearing, foundation excavation and installation (as needed) and replacement poles, as well as wire stringing. Where existing wood poles would be completely removed, extracted pole bases would be backfilled with soil, except in the San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Natural Reserve Extension.

Table 5.12-7 Typical Eight-hour Average Noise Levels from Construction Equipment

Equipment	8-hour Noise Levels from Source (dBA)				
	50 ft.	100 ft.	200 ft.	500 ft.	1,000 ft.
Air Compressor	73	67	61	53	46
Aerial Bucket Truck	73	67	61	53	46
Backhoe	76	70	64	56	49
Crane	76	70	64	56	49
Drill Rig/Truck-Mounted Augur	78	72	66	58	51
Grader	75	69	63	55	48
Mower	75	69	63	55	48
Impact Wrench	80	74	68	62	58
Forklift	80	74	68	62	58
Haul/Dump Truck	80	74	68	62	58
Water Truck	80	74	68	62	58
Loader	79	73	67	61	57
Portable Generator	70	64	58	50	43
Rock Drill/Rock-Drilling Equipment	74	68	62	54	47
Backhoe	83	77	71	63	56
Concrete Saw	73	67	61	53	46
Crane	77	71	65	57	50
Excavator	78	72	66	58	51
Jackhammer	75	69	63	55	48
Paver	74	68	62	54	47
Dump Truck, Flatbed Truck	76	70	64	56	49
Vacuum Truck	81	75	69	61	54
Wire Pulling Machine	74	68	62	54	47

Source: FHWA 2006

Note: Noise levels listed above are illustrative and represent the typical types of equipment that would be used for project construction. Values in dark boxes exceed the 75 dBA noise threshold at the stated distance from the source; grey shading indicates noise level is at the reported threshold.

Key:
dBA = A-weighted decibels
ft = feet

Generally, pole work could be moderately noisy at times, averaging about 82 dBA, which would exceed the 75-dBA threshold at adjoining residential property lines established in both City of San Diego and City of Del Mar noise ordinances. As noted in the applicant's Proponent's Environmental Assessment, construction activity between three sets of existing poles (San Diego Gas & Electric [SDG&E] poles 24 and 49; poles 52 and 71; and poles 77 and 81) on TL666D would occur within 50 feet of approximately 84 residential parcel lines (SDG&E 2017).

In the event that construction noise could expose sensitive receptors to noise levels greater than 75 dBA at 50 feet from residential parcel lines, the applicant shall adhere to the timeframes established by local ordinances to limit noise events to permitted times for construction activity as identified in **MM NOI-1**.

MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction:

- **City of San Diego:** 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).
- **City of Del Mar:** 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays).

In the event that project scheduling necessitates work outside of the hours permitted under local noise ordinances, SDG&E would meet and confer with the local jurisdictions, as needed, for guidance on scheduling and managing such construction noise in compliance with Article 9.4: Noise Abatement and Control, of the City of San Diego Municipal Code.

It is not likely that any one piece of machinery would operate continuously or fully throttled. Noise events would be punctuated by periods during which no equipment would operate, and noise levels at work sites would be near ambient levels. The characteristics related to a particular tool's use (duration, intensity and location) factor into developing average sound levels assigned to each piece of equipment over a typical 8-hour day.

Circuit Breaker Removal and Replacement, Del Mar Substation

The nearest receptor to the Del Mar Substation is a residential use located upslope approximately 130 feet north from the circuit breaker removal and replacement area. To the east of the substation and downslope is an I-5 off-ramp connecting to Via De La Valle and interstitial open space. To the south is the substation's private driveway from Via De La Valle. To the west is an approximately 30-foot-wide roadway that provides access to the residents atop the hill north of the substation site. On the western side of the roadway are a mix of commercial uses, including the Therapeutic Learning Center about 228 feet southeast of the circuit breaker work area on the substation site. Construction noise would be generated by the use of equipment and machinery, such as jackhammers, loaders, forklifts, and haulers, at the substation site. This equipment would be used to remove existing an circuit breaker and to lay new concrete foundation; to remove, replace, and off-haul circuit breaker unit(s); and to create a trench for underground conduit that would connect transmission/distribution lines that would feed into the substation.

Substation work could generate 8-hour average noise levels of up to 80 dBA at 50 feet from the source. Noise levels would attenuate to about 71 dBA at the nearest residential receptor to the north and to approximately 69 dBA at the property line of the Therapeutic Learning Center to the southeast. It is noted that on this site as on others, crews would not operate noisy equipment for entire workdays uninterrupted. Noise levels represent maximum levels from intermittent noise events from various noise-producing sources that are then averaged over an 8-hour period. Although construction noise would be temporary and intermittent, **MM NOI-2** is identified to address receptors 50 or nearer to construction noise sources.

Moreover, ~~MM NOI-2~~ has been identified for the notification of receptors within 50 feet of construction areas. As noted in the measure, sensitive receptors shall be notified at least 30 days prior to commencement of construction in order to provide opportunity to avoid construction noise when work is scheduled nearest the affected party.

MM NOI-2: Advance Notice of Construction. The applicant shall notify all sensitive receptors, including residences, within 50 feet of all project components at least 30 days prior to construction activities occurring in that area to provide opportunity to avoid the noise. The notice shall include dates, times, and description of construction activities. The applicant shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction.

According to the applicant, work in the proximity of any single location on the power line would likely last between a few hours when topping or removing an existing pole to a few days to one week when installing new poles or removing/installing new conductor. As a means of further reducing construction noise exposure to sensitive receptors, the applicant shall implement **MM NOI-03**.

MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance, whichever is higher. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:

- Temporarily and safely installing and maintaining absorptive noise control barriers ~~in the perimeter of construction sites and/or~~ between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.
- Limiting heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity.
- Ensuring that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition.
- Maintaining construction equipment according to manufacturer recommendations.
- Minimizing unnecessary construction equipment idling.
- Reducing noise from back-up alarms (i.e., alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimize the need for back-up alarms. Use flagmen to minimize the time needed to back up vehicles.
- When possible, using construction equipment specifically designed for low noise emissions, such as equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines.
- Where practical, locating stationary equipment such as compressors and generators away from sensitive receptors.

SDG&E has determined that the use of temporary noise barriers would be infeasible due to contractors using mobile construction equipment to complete the pole removal, installation, and topping work. Noise attenuation for these activities would necessitate barriers placed outside of planned work areas in order to maintain safe clearances for mobile equipment. Further, most work at pole locations is anticipated to last one day or less. Set up and removal of barriers would constitute substantial additional time and work at each location and could delay construction and attendant construction-related effects to residents. For those reasons, the use of temporary noise control barriers recommended in **MM NOI-3** would be only feasible to implement with the use of stations (i.e., non-mobile) construction equipment.

Underground Power Line Construction

As described in ~~Section~~ Chapter 4.0, "Project Description," the proposed project would also include three segments of new underground power line associated with TL674A reconfiguration, C510 conversion, and C738 conversion. As shown in Table 5.12-7, above, concrete saws for cutting through pavement prior to excavating the required trenches would be the loudest piece of equipment utilized during construction of the underground segments. Shaded boxes illustrate that construction noise may exceed the 75-dBA limit in various locations. Use of this type of saw would generate an eight-hour average noise level of 75 dBA at a distance of approximately 125 feet from the source. As a result, any residences located within 125 feet of these underground segments may be temporarily exposed to noise levels in excess of the acceptable threshold (75 dBA). Of the proposed project's three underground segments, the C510 conversion is the only one with residential parcels (approximately 12) located within 125 feet of the proposed alignment.

MM NOI-1, **MM NOI-2**, and **MM NOI-3**, as previously discussed, would be implemented to reduce noise from work in the C510 and C738 corridors. Because the applicant has determined the use of temporary barriers is infeasible for temporary mobile construction work, SDG&E would, in the event that construction noise would exceed 75 dBA at adjacent residential property lines, meet and confer with the City of San Diego and/or the City of Del Mar to discuss temporarily deviating from the local noise standards. This process is included as a Project Design Feature and Ordinary Construction Restriction in Chapter 4, "Project Description." If requested by the pertinent local agency, SDG&E would evaluate the potential to offer temporary relocation of residents.

With the implementation of **MM NOI-1**, **MM NOI-2**, and **MM NOI-3**, as well as ordinary construction restrictions, impacts associated with overhead power line construction and removal would be less than significant.

Staging / Fly Yards

The proposed project would include four staging areas/fly yards for use during construction for refueling construction vehicles, pole assembly, open storage of material equipment, trailers, portable restrooms, and construction personnel parking. These sites may also be used for the staging and refueling of helicopters during the conductor installation/removal processes and during pole removal and topping activities. The applicant indicates the potential for the use of two helicopter types, a Kaman K-Max and/or Hughes 500, to facilitate conductor and pole removal in wetland and other sensitive areas where access limitations would preclude use of ground-based crews, such as within the San Dieguito Lagoon, Peñasquitos Lagoon and Torrey Pines State Nature Reserve Extension. While it is likely that either helicopter would accomplish pole topping, removal, and off-haul tasks, this analysis conservatively considers the craft that

would result in higher operating noise generation, which would account for the other craft's lesser noise, should SDG&E use the helicopters interchangeably. Helicopter use would occur up to 8 hours per day for 10 days during the 12-month construction period. According to technical specifications, the Hughes500's operational noise ranges from about 89 dBA at liftoff, 88 dBA during flyovers, and about 90 dBA on approach.

Table 5.12-8 indicates average noise levels proximate to nearest residential parcels at the proposed staging areas and fly yards.

Table 5.12-8 Anticipated Staging Area/Fly Yard Noise Levels

Staging Area/Fly Yard	Distance and Direction Nearest Residential Property Line (feet)	Anticipated 8-hour Average Noise Level (dBA)
Pumpkin Patch	450 feet south	71
Del Mar Fairgrounds	2,400 feet southwest	56
Del Mar Heights	420 feet east	72
Torrey Pines State Beach	640 feet northeast	68

Source: SDG&E 2017

Noise generated at these sites would be intermittent and associated with periodic movement of equipment in and out of the staging area and helicopter operation. When noise attenuation is considered based on distances to receptors at the nearest residential parcels, resulting 8-hour noise levels may be audible and to some potentially considered a nuisance, but levels would not exceed the 75 dBA threshold established in local ordinances.

Noise generated from the operation and maintenance phase of the project is anticipated to be minimal and would result primarily from the operation of maintenance vehicles. Normal operations and maintenance would not cause noticeable increases of ambient noise at the closest receptors. While construction noise may temporarily expose certain receptors nearest work areas to noise at levels in excess of 75 dBA, implementation of MM NOI-1, MM NOI-2, and MM NOI-3, project noise impacts would be less than significant.

Significance: Less than Significant with Mitigation Incorporation.

b. *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

Groundborne vibration during construction would occur mainly from heavy duty construction equipment, such as drilling rigs, jack hammers, and loaded trucks. Construction vibration levels for one piece of each type of equipment at 50 feet are shown in Table 5.12-9.

Table 5.12-9 Anticipated Construction Vibration Levels

Equipment	Vibration of One Piece of Equipment at 50 feet		Exceeds FTA Threshold at 50 feet?	
	PPV ^(a)	VdB ^(b)	Structural Damage (0.2 PPV)	Human Annoyance (75 VdB)
Caisson Drill	0.03	43	No	No
Jack Hammer	0.01	39	No	No
Loaded Truck	0.03	43	No	No

Source: FTA 2006.

Notes:

^(a) Calculated using $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where PPV_{equip} is the calculated vibration of the equipment in PPV, PPV_{ref} is the equipment's PPV at 25 feet (inches/second), and D is a distance of 50 feet.

^(b) Calculated using $L_v(D) = L_v(25 \text{ feet}) - 30 \log(D/25)$, where $L_v(D)$ is the calculated vibration of the equipment in VdB, L_v is the approximate level of vibration of the equipment at 25 feet, and D is a distance of 50 feet.

Key:

FTA = Federal Transit Administration

PPV = perturbation projection vector

VdB = vibration decibels

The applicant anticipates simultaneously using a maximum of two drill rigs with augers and five loaded trucks during the various construction activities for each component of the proposed project. Jackhammers would be used on an as-needed basis to break up concrete (SDG&E 2017). Though multiple pieces of equipment could cause greater vibration levels than those in Table 5.12-9, vibration would be either intermittent or continuous with a limited duration, and it would be unlikely that all described pieces of equipment would operate concurrently during project construction. For example, perception of vibration from trucks would be intermittent as trucks pass through the vicinity of sensitive receptors. Perception of vibration from drilling would be continuous, but with a limited duration. The vibration annoyance from construction would be less than significant. Groundborne noise would be lower than noise emitted directly from equipment. Groundborne noise levels generated from operation of the proposed project would be minimal to the closest receptors, resulting primarily from the operation of maintenance vehicles. Operational groundborne noise impacts would therefore be less than significant. Normal operations and maintenance activities are not anticipated to cause noticeable groundborne vibration at the closest receptors. Therefore, there would be no change in vibration levels associated with project operations and maintenance activities, and there would be no impact to receptors.

Significance: Less than Significant.

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

Construction activities would occur over a finite, 12-month period; therefore, no permanent increase in noise would occur, and there would be no impact. The proposed project would not involve construction of any new noise-generating facilities. The removal of TL666D and the conversion of portions of TL674A, C510, and C738 from an overhead to underground configuration would result in a reduction in existing corona noise as underground power line facilities are not audible. As a result, there would be no impact related to increases in ambient noise levels.

Significance: 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?*

As described under criterion (a), construction activities would, in most instances, comply with the relevant local noise ordinances for the City of San Diego and City of Del Mar. There may be locations during pole installation/removal and underground duct bank construction where 8-hour average noise levels may exceed 75 dBA at nearby residences and other noise-sensitive receptors (e.g., parks and other recreational uses). Because of the linear nature of the proposed project, construction at each location would range from a few hours to up to one week at a time. Due to the short-term nature of the construction at each location, the number of residents that would be exposed to noise levels in excess of 75 dBA would be limited, and SDG&E would meet and confer with the local agencies to discuss additional measures that may be implemented to reduce impacts. As a result, impacts will be less than significant.

The proposed project would also utilize workspaces within or directly adjacent to two schools—Del Mar Hills Elementary School and Del Mar Heights Elementary School. The majority of these workspaces would be used to top or remove existing TL666D poles. Heavy equipment, including bucket trucks and aerial lifts, would be used in these locations. In addition, a staging area/fly yard would be located within the athletic field at Del Mar Heights School. This landing zone would require construction crews to utilize the school's parking lot and internal roadways for access.

These activities could generate temporary noise levels in excess of 75 dBA, which has the potential to disrupt school activities. To ensure that these schools are not disrupted during construction, SDG&E would implement **APM-PS-01**, which would require that all construction activities be coordinated with schools to minimize potential impacts from noise. With the implementation of this APM and mitigation measures **MM NOI-1**, **MM NOI-2**, and **MM NOI-3**, impacts would be less than significant.

Significance: Less than Significant with mitigation incorporated.

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?*

The proposed project would not be located within an airport land use plan area or within 2 miles of a public airport or public use airport (the nearest airport, McClellan-Palomar Airport, is at least 10 miles away). Therefore, no impact would occur under this criterion.

Significance: No Impact.

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?

The proposed project would not be located within the vicinity of a private airstrip. The nearest restricted-use runway is Marine Corps Air Station Miramar, at least 6 miles away. Therefore, no impact would occur under this criterion.

Significance: No Impact.

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5.13 Population and Housing

5.13.1 Environmental Setting

Population

The city of San Diego, with its 1.37 million inhabitants, ranks as the second-most populous city in California. San Diego's 340-square-mile footprint also makes it the state's second largest city in terms of land area, its borders extending from the San Pasqual Valley in the northeast, to over 70 miles of Pacific coastline on the west to the United States–Mexican border on the south. For purposes of collecting and sampling data, statisticians group individual cities like the city of San Diego with other communities into “metropolitan statistical areas” (MSAs). MSAs are geographical regions defined by a core with a relatively high population density that has close economic ties throughout the area. Typically, an MSA is centered on a single large city like San Diego that wields substantial influence over the region, but some MSAs comprise multiple urban centers. The boundaries of the San Diego–Carlsbad MSA are coterminous with San Diego County and include 18 cities, numerous census designated places, and unincorporated communities. According to the 2016 American Community Survey (ACS), San Diego County has a population of 3.2 million.

The San Diego Association of Governments (SANDAG) forecasts continued population growth over the next 30 years, but at a slower pace than in previous decades. In the period from 2011 to 2016, the population of San Diego County grew at an annual average rate of 1.0 percent, largely as a result of new births, but also from in-migration, with 9,500 migrants entering the county every year during this five-year period. From 2017 to 2022, population growth is anticipated to decelerate slightly, with an average 0.7 percent annual growth rate. By 2020, the city of San Diego's population is forecast to grow 8 percent over the prior decade, bringing the city's population to 1,487,652 inhabitants (see Table 5.13-1). Population increases are anticipated in the city through a foreseeable horizon of 2050, at which point its population could exceed 1.9 million inhabitants, representing a 49 percent increase of population over the 50-year span that dates back to the year 2000 (SANDAG 2011).

Table 5.13-1 Population 2016–2050, Cities of Del Mar and San Diego; San Diego County

City/County	Population 2016	Population 2020 (est.)	Population 2050 (est.)	Change 2016–2050
City of Del Mar	4,312	4,792	5,151	16%
City of San Diego	1,374,812	1,487,652	1,947,184	30%
San Diego County	3,317,749	3,405,068	4,210,591	22%

Sources: SANDAG 2011; U.S. Census Bureau 2012–2016a

In contrast, the small-scale coastal community of Del Mar occupies an area of just under 2 square miles bordered by Solana Beach to the north and Torrey Pines State Beach and Reserve and city of San Diego to the south. According to American Community Survey (ACS) data, the city of Del Mar had a 2016 population of 4,312 inhabitants (U.S. Census Bureau 2012–2016a).

The construction and completion of the Interstate 5 corridor connecting Del Mar to San Diego and to points beyond has historically been an influential driver of population growth in Del Mar and surrounding communities. For example, during the 1960s and 1970s, San Diego County's population more than

doubled. Population in the communities of Oceanside, Carlsbad, Solana Beach, Del Mar, and San Diego increased fourfold between 1970 and 2010 (Caltrans 2010). Today, the availability of developable land is a factor constraining construction of new housing in Del Mar, which moderates local population growth. Over the long term, SANDAG estimates that Del Mar's population will grow incrementally and exceed 5,100 inhabitants by 2050 (SANDAG 2011).

Employment

In 2016, there were 1.4 million wage and salary jobs in the San Diego MSA. The average salary per worker was \$75,764, and the median income was \$66,529. San Diego's economic base is diverse, with occupations in technological and professional services, manufacturing, natural security, international trade, academia, and tourism. The U.S. Navy is the city's largest employer. As illustrated in Table 5.13-2, the city of San Diego's year 2016 civilian workforce breaks down into the following occupational categories: 45.8 percent management, business, science, and arts; 21 percent sales and office; 19.5 percent service; 5.8 percent natural resources, construction, and maintenance; and 7.1 percent production, transportation, and material moving. The city of Del Mar's civilian workforce in the same period reflects a similar distribution: 59.9 percent management, business, science, and arts; 22.2 percent sales and office; 9.2 percent service; 8.8 percent natural resources, construction, and maintenance; and 7.1 percent production, transportation, and material moving. The city of Del Mar's civilian workforce in the same period reflects a similar distribution: 59.9 percent management, business, science, and arts; 22.2 percent sales and office; 9.2 percent service; 8.8 percent natural resources, construction, and maintenance; and 7.1 percent production, transportation, and material moving (U.S. Census Bureau 2012–2016b).

Table 5.13-2 Civilian Workforce Occupation, Cities of Del Mar and San Diego; San Diego County

Jurisdiction	Civilian Workforce by Occupational Sector				
<i>sector</i>	Management, Business, Science, Arts	Sales & Office	Service	Natural Resources, Construction, Maintenance	Production, Transport, Material Moving
Del Mar	59.9%	22.2%	9.2%	8.8%	–
San Diego	45.8%	21.8%	19.5%	5.8%	7.1%
San Diego County	41.0%	23.3%	19.6%	7.7%	8.5%

Source: U.S. Census Bureau 2012–2016b

Key:

– = no data regarding civilian occupation within this sector

San Diego's median household income is \$68,117, and its unemployment rate is between 3.9 and 4.6 percent (see Table 5.3-3) (U.S. Census Bureau 2012–2016c). City estimates forecast total civilian employment to increase 17 percent by year 2030, primarily attributable to increases in the service and professional sectors (City of San Diego 2015). In the same timeframe, Del Mar's median household income was \$108,556 (U.S. Census Bureau 2012–2016d), and that city's annual unemployment ranged between 4.1 and 5.1 percent over the year (U.S. Census Bureau 2012–2016c). The unemployment rate of 7.8 percent for the county is higher than the recorded rates for either city (see Table 5.13-3).

Table 5.13-3 Median Household Income

Jurisdiction	Median Household Income	Unemployment Rate
City of Del Mar	\$108,556	4.1–5.1%
City of San Diego	\$68,117	3.9–4.6%
San Diego County	\$66,529	7.8%

Sources: U.S. Census Bureau 2012–2016c, 2012–2016d

Housing

Population and employment opportunities (jobs) are factors that may influence demand for housing regionally and locally. A mismatch between jobs and housing availability contributes to a variety of environmental impacts such as air pollution, greenhouse gas emissions, and noise pollution associated with daily commuting patterns. Between 2010 and 2016, 32,770 housing units were added to the housing stock throughout the region of the proposed project. Within this same period, the city of San Diego's housing stock increased by 7 percent, for a total of 483,092 units; new housing is expected to keep pace with foreseeable population growth anticipated in the region.

The Housing Elements in the City of San Diego General Plan and the City of Del Mar Community Plan include policies that encourage housing production sufficient for all income groups. San Diego's General Plan Housing Element reports that over the past several decades the trend in constructing multi-family housing has been ascendant relative to the construction of single-family dwellings (City of San Diego 2013; City of Del Mar 1985). The trend supports General Plan policies that encourage developing compact, transit-oriented communities as a way of increasing housing supply while preserving the character of existing residential neighborhoods and protecting open spaces and other resources.

The housing vacancy rate indicates what portion of housing stock is available to prospective tenants or homebuyers on a scale where 7 percent or greater reflects a market disequilibrium with supply in excess of demand, and 3 percent or lower represents the opposite condition—a shortage of supply relative to demand. In 2016, the vacancy rate in San Diego County ranged between 5.0 and 7.0 percent annualized. Within central San Diego, roughly 3.4 percent of housing was vacant during the same period, after adjusting to exclude seasonally occupied units. The vacancy rate in Del Mar was slightly higher at 6.3 percent than in San Diego for the comparable period.

5.13.2 Regulatory Setting

Federal and State

No federal or state housing laws, regulation, or policies are applicable to population and housing within the proposed project vicinity.

Local

The Housing Elements of the City of San Diego and City of Del Mar General Plans were reviewed for policies applicable to the analysis of population and housing impacts of the proposed project (City San Diego 2013). The proposed project does not appear to conflict with any of the General Plan housing policies. The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to population and housing, this analysis presents local policies, ordinances and guidelines pertinent to population and housing within the project area and vicinity for informational purposes.

5.13.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

No applicant-proposed measures are applicable to population and housing.

Significance Criteria

Table 5.13-4 includes the significance criteria from Appendix G of the CEQA Guidelines' population and housing section to evaluate the environmental impacts of the proposed project on this resource.

Table 5.13-4 Population and Housing Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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)?

The proposed project would not induce substantial population growth either directly or indirectly. The proposed project would represent an upgrade to the transmission network serving the Del Mar Substation, which would enhance flexibility in the configuration and operation of the electrical grid.

The proposed project would not involve the construction of new homes or business facilities and would not extend power line and distribution infrastructure to residences/businesses not currently within the San Diego Gas & Electric (SDG&E) service territory.

SDG&E anticipates that up to 125 personnel would be required for the various activities scheduled during the 12-month construction period. While the number of personnel would vary depending on the particular task, SDG&E estimates that a 125-person construction crew reflects the maximum number of personnel that would be active on a given day. SDG&E anticipates that the construction workforce needed for the proposed project would reside in the local area and would not require temporary or permanent lodging. Because the proposed project would not create a long-term source of employment in the area, or otherwise encourage people to relocate to the region, it would not direct or indirectly affect population growth. Once the proposed project was operational, SDG&E personnel would maintain and repair the utility lines as needed. The proposed project would not directly alter existing system capacity or indirectly affect the availability of energy resources that would facilitate growth of local industry.

For these reasons, the proposed project would not directly induce growth or cause any substantial indirect growth-inducing environmental impacts.

Significance: No Impact.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The proposed project would not displace existing housing, nor would it necessitate the construction of replacement housing elsewhere. As indicated in Chapter 4, "Project Description," construction of the proposed project would occur within existing SDG&E public rights-of-way, city streets, or open space areas where no housing currently exists.

The proposed project would require use of some areas temporarily to accommodate construction staging and access associated with pole installation/removal, stringing sites, and work areas. As described in the Project Description, SDG&E would locate staging and fly yards in industrial or commercial areas on sites that would temporarily accommodate and support construction through completion of the proposed project. The installation and removal or modification of utility poles is an activity that would occur within the entire project area, which includes some residential areas and public uses. Installation, modification, and removal of utility poles would occur within designated SDG&E utility corridors, within city streets, or in open space areas and would not require the acquisition of land to facilitate these activities that could result in displacement of housing. Upon completion of construction work, project operations and maintenance would similarly neither cause displacement of housing nor require the construction of any replacement housing, and no impact would occur.

Significance: No Impact.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

As described in responses to criteria (a) and (b) above, the purpose of the proposed project is to reconfigure and remove existing utility lines to improve the reliability of the electrical network and reduce the need to maintenance or repair lines in environmentally sensitive areas. Project construction or maintenance activities described in Chapter 4, "Project Description," would not cause displacement of any existing housing or substantial numbers of people, necessitating the construction of replacement housing elsewhere. As such, the proposed project would have no impact on population and housing.

Significance: No Impact.

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5.14 Public Services

5.14.1 Environmental Setting

The proposed project would include the removal of approximately 6 miles of existing overhead power line and associated poles (TL666D), the reconfiguration of TL674A into an approximately 1.1-mile-long underground configuration, and the conversion of portions of existing 12-kilovolt power overhead lines C510 and C738 to underground configurations. Figure 5.14-1 shows the fire stations, police stations, schools, parks, hospitals, and libraries near project utility corridors. A study area of 1,000 feet around the project corridor is overlaid on the figure in order to identify the sensitive receptors (i.e., schools, medical centers, and fire stations) that may be affected by project construction activities. Section 5.12, “Noise,” provides additional information on sensitive receptors, and Section 5.15, “Recreation,” includes additional information pertaining to access to parks and other recreation facilities during project construction.

Fire Protection and Emergency Services

City of San Diego

The city’s Fire-Rescue Department provides emergency medical, lifeguard, and emergency management services; 911 services; fire suppression, permitting, and inspections; and community education. The city operates 48 fire stations (City of San Diego n.d.[a]). The closest fire stations to project utility corridors are Fire Station 24, serving Carmel Valley/Del Mar Heights, at Mango Drive at Del Mar Heights Road, and Fire Station 41, serving Sorrento Valley, at 4914 Carroll Canyon Road.

City of Del Mar

The City of Del Mar maintains its own fire department, which is responsible for firefighting; fire suppression; fire code enforcement; fire prevention programs; and responses to rescue, resuscitation, and vehicle accident calls (City of Del Mar 1976). Del Mar’s single fire station is located on the San Diego County Fairgrounds at 2200 Jimmy Durante Boulevard.

Police Protection

City of San Diego

The San Diego Police Department provides law enforcement services and operates several specialized divisions, including domestic violence, financial crimes, forensic science, and traffic units (City of San Diego 2008). The police station closest to the proposed project would be the Northwestern Division, serving Sorrento Valley, Torrey Preserve, Del Mar Heights, Carmel Valley, North City, Torrey Highlands, and Black Mountain Ranch; it is located at 12592 El Camino Real.

City of Del Mar

As noted, the San Diego Sheriff provides law enforcement services for the City of Del Mar, which includes street and traffic patrol, crime prevention, and other typical law enforcement services (City of Del Mar 1976).

Schools

Three ~~Five~~ schools are within 1,000 feet of the proposed project's utility corridors: ~~Solano Santa Fe Elementary School~~, Del Mar Hills Elementary School, ~~Therapeutic Learning Center~~, Del Mar Nursery School, ~~Brighter Future Preschool and Child Development Center~~, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). ~~Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area TL674A (WA-2).~~ Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard. Therapeutic Learning Center is located approximately 75 feet west of the TL674A Underground Work Area, and is across the street from the Del Mar Substation. Del Mar Nursery School is located approximately 175 feet west of the TL666D project component (WA-67). Brighter Future Preschool and Child Development Center is located approximately 400 feet west of the TL666D project component (WA-100 and WA-102).

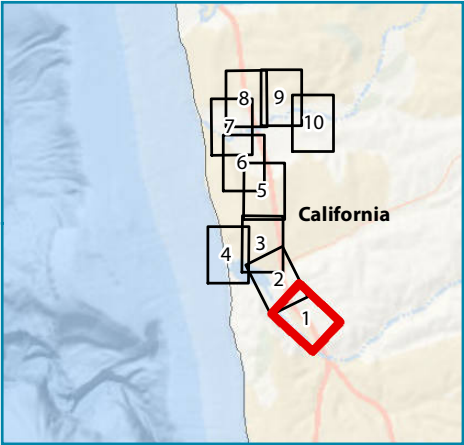
Parks

As illustrated on Table 5.15-1 in Section 5.15, "Recreation," a variety of parks, recreation facilities, and open spaces are in the vicinity of the proposed project's utility corridors. The project's proposed Torrey Pines Fly Yard would be located at a surface parking area adjacent to the Torrey Pines State Reserve, which would function as a temporary work area during the proposed project's construction phases. The state reserve is within the City of San Diego and provides public access to 1,500 acres of maritime chaparral, Torrey pine, beaches, and a lagoon (Torrey Pines Docent Society 2018).

Other Public Facilities

Two hospitals would be in proximity to the proposed project. Sharp Rees-Stealy Medical Center Del Mar, adjacent to TL674A Reconfiguration, provides comprehensive medical services to the communities of Del Mar, as well as Carlsbad, Encinitas, Rancho Santa Fe, and Solana Beach (Sharp 2018). Scripps Green Hospital offers clinical and surgical services to those living and working in La Jolla and San Diego (Scripps 2018). The hospital is located at 10666 North Torrey Pines Road and is 1.4 miles southwest of the TL666D alignment.

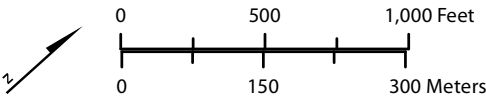
The Del Mar Branch Library is located at 1309 Camino Del Mar (San Diego County Library n.d.). The San Diego Public Library serves the City of San Diego from a Central Library at 330 Park Boulevard and from 35 branches located throughout the project area (City of San Diego n.d.[b]).



- | Proposed Project Components | Sensitive Receptors |
|-----------------------------|---------------------|
| C738 Conversion | School |
| TL666D Removal | |
| Drop Zone | |
| Stringing Site | |
| Work Area | |
| Temporary Footpath | |
| 1,000-foot Study Area | |
| Jurisdictional Boundary | |

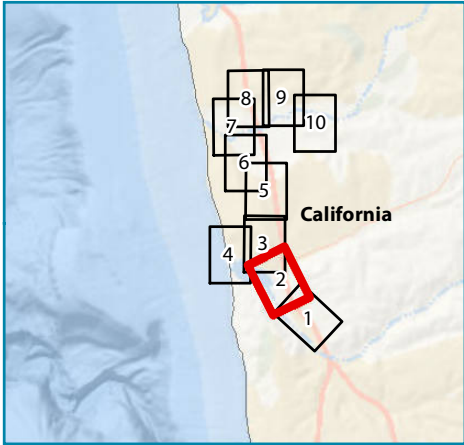
Figure 5.14-1
Public Services near
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019





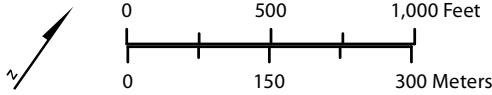
Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017; California Department of Education 2019

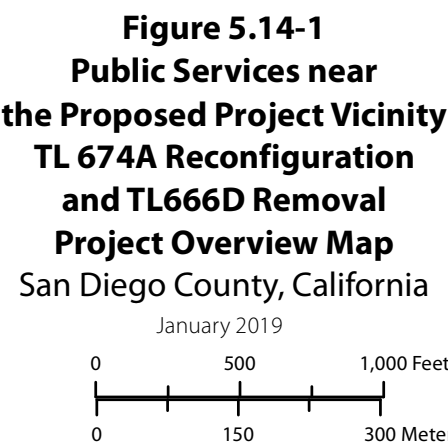
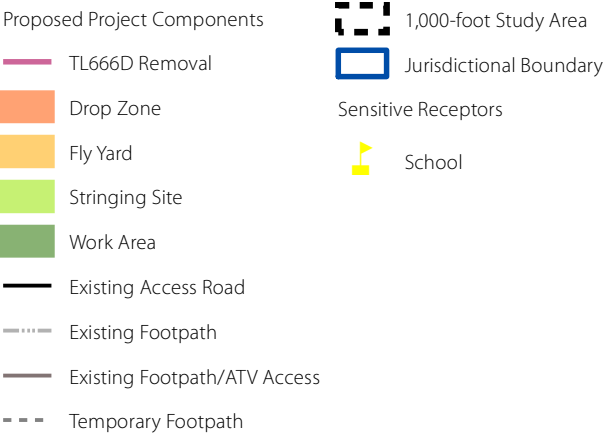
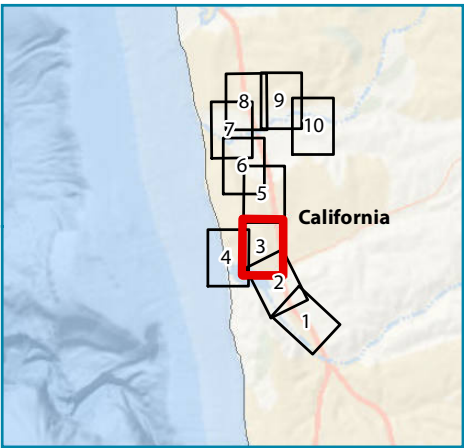
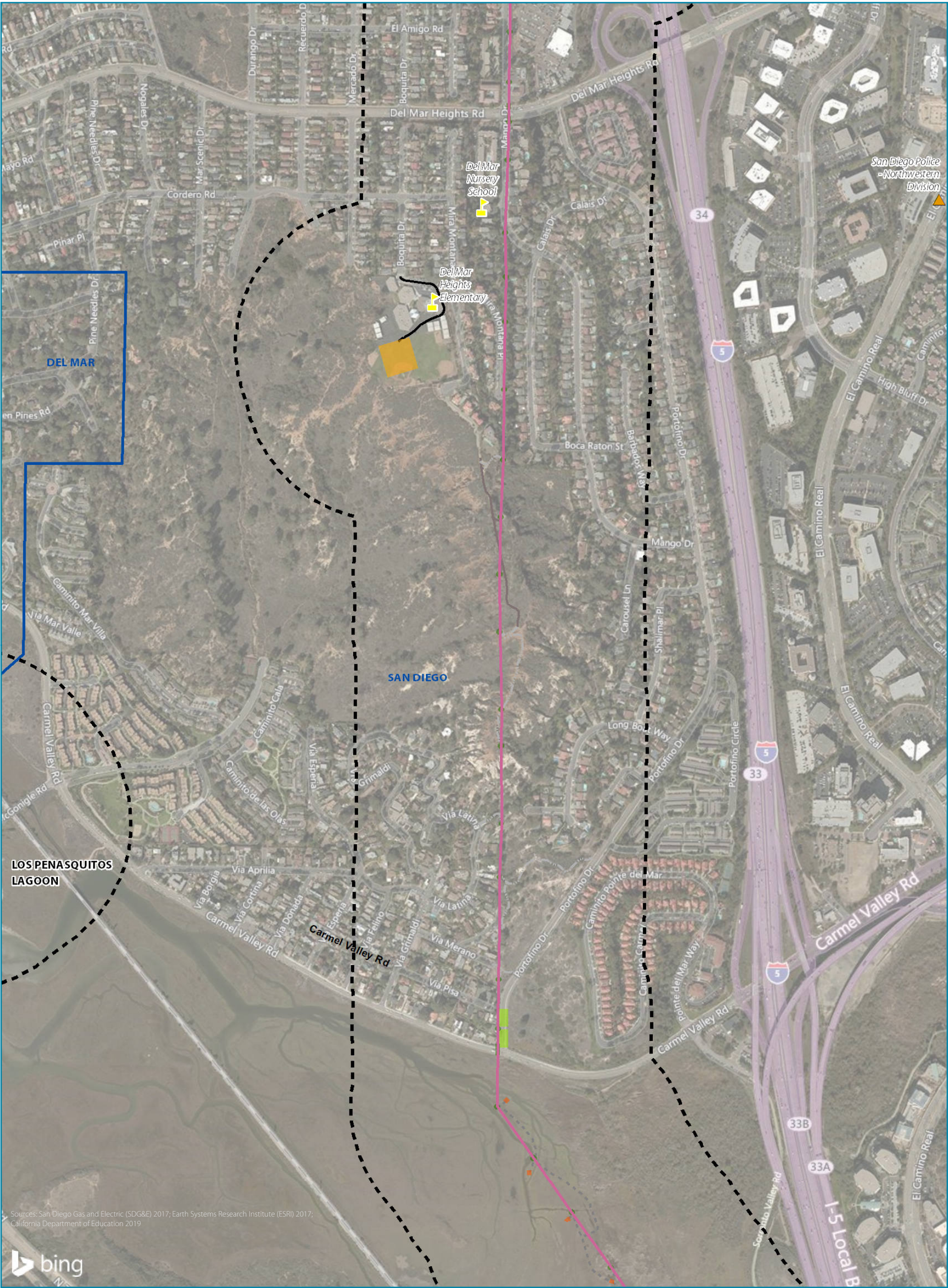


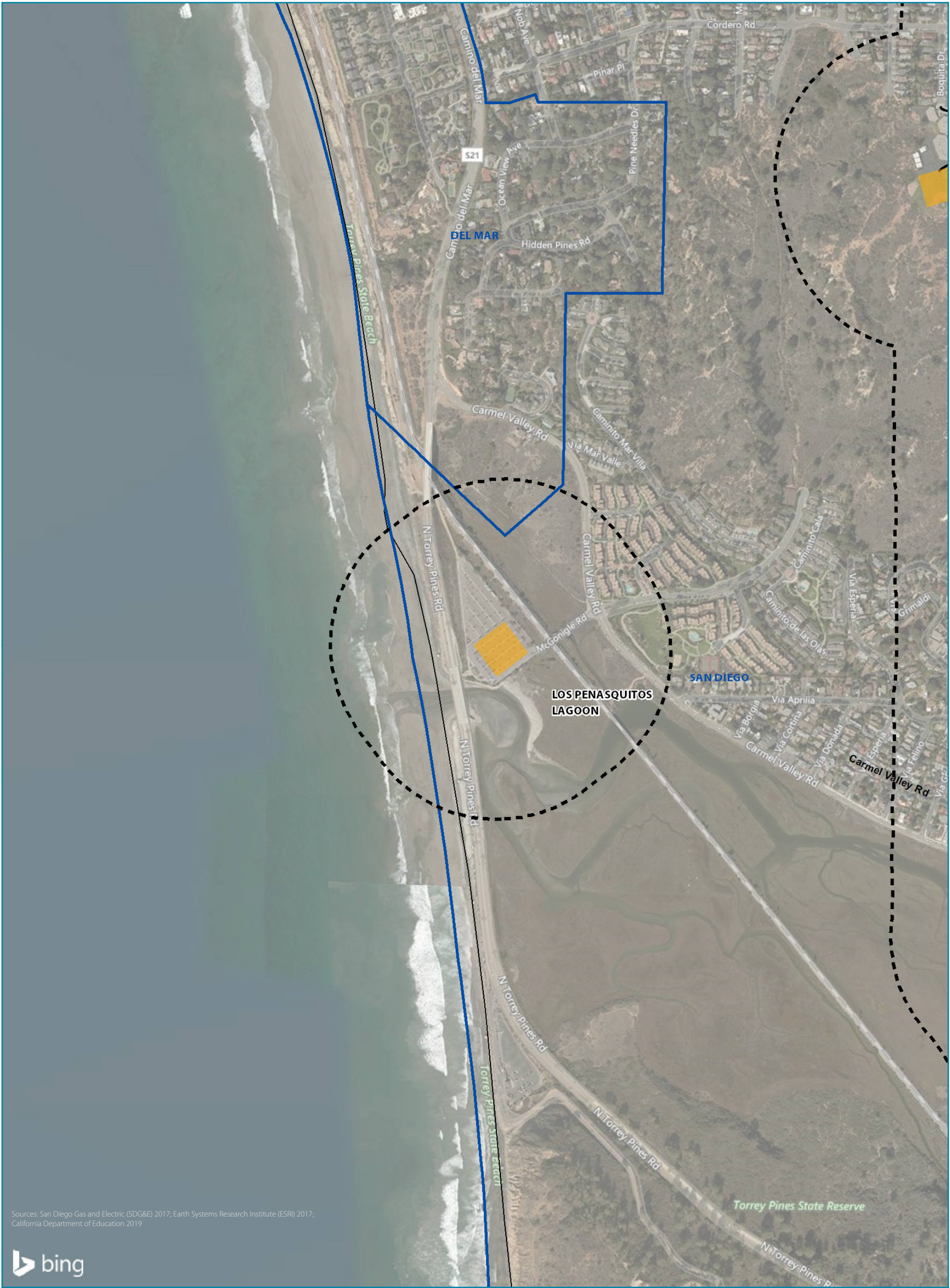
- Proposed Project Components
- C738 Conversion
 - TL666D Removal
 - Drop Zone
 - Stringing Site
 - Work Area
 - Existing Footpath
 - Existing Footpath/ATV Access
 - Temporary Footpath
 - 1,000-foot Study Area
- Jurisdictional Boundary

Figure 5.14-1
Public Services near
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

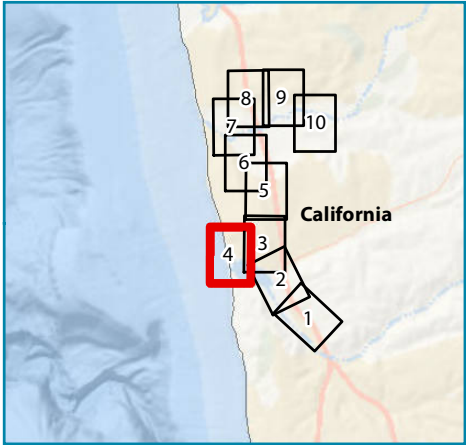
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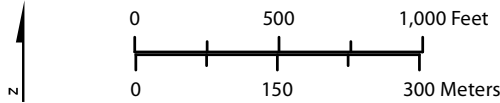
Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017; California Department of Education 2019

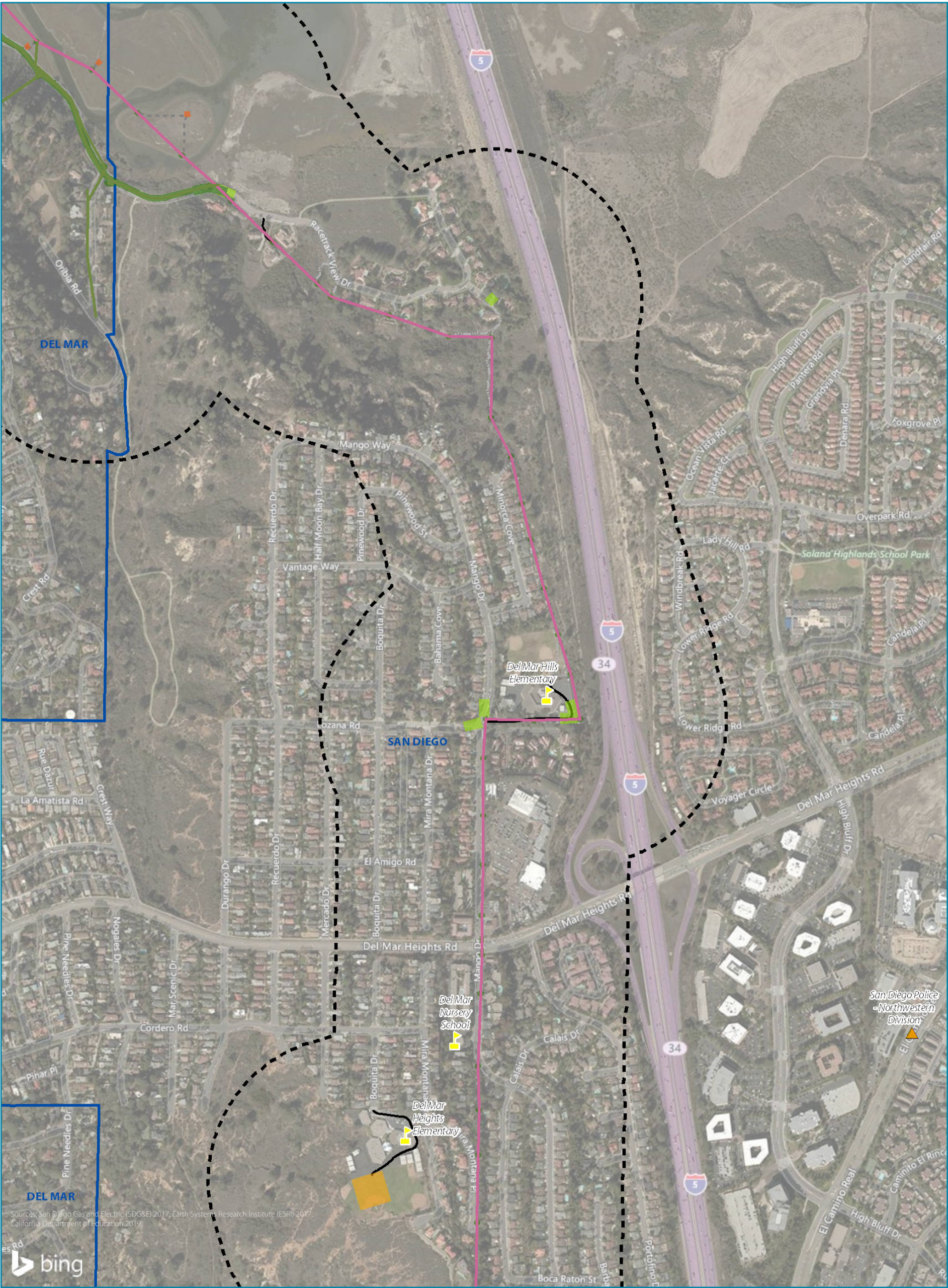


- Fly Yard
- Existing Access Road
- 1,000-foot Study Area
- Jurisdictional Boundary

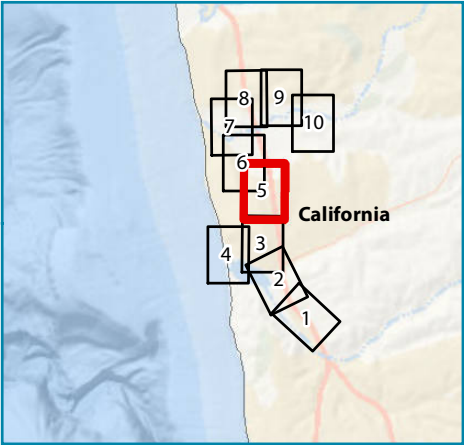
Figure 5.14-1
Public Services near
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019





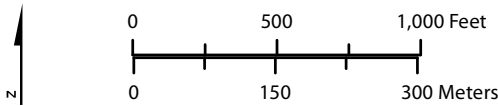
Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017; California Department of Education 2019.

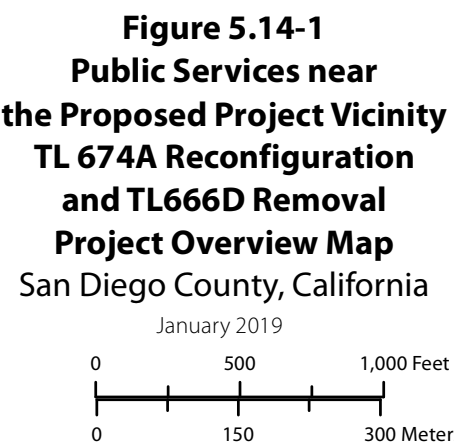
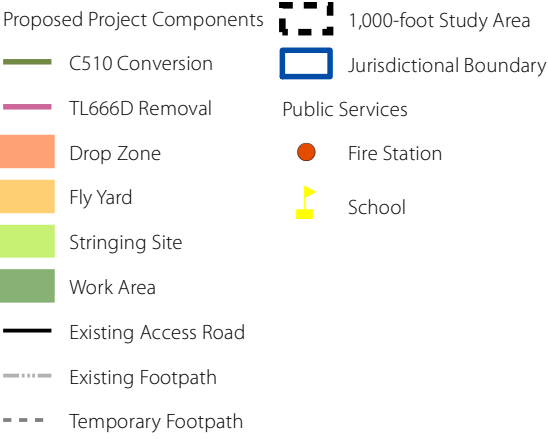
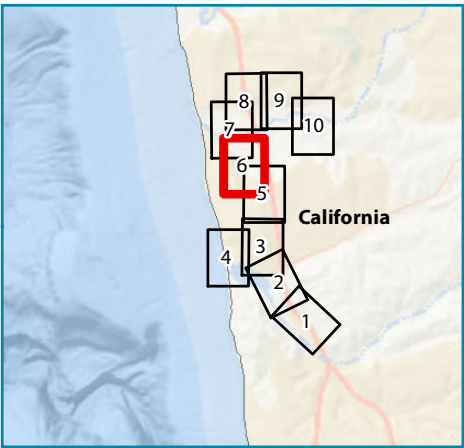
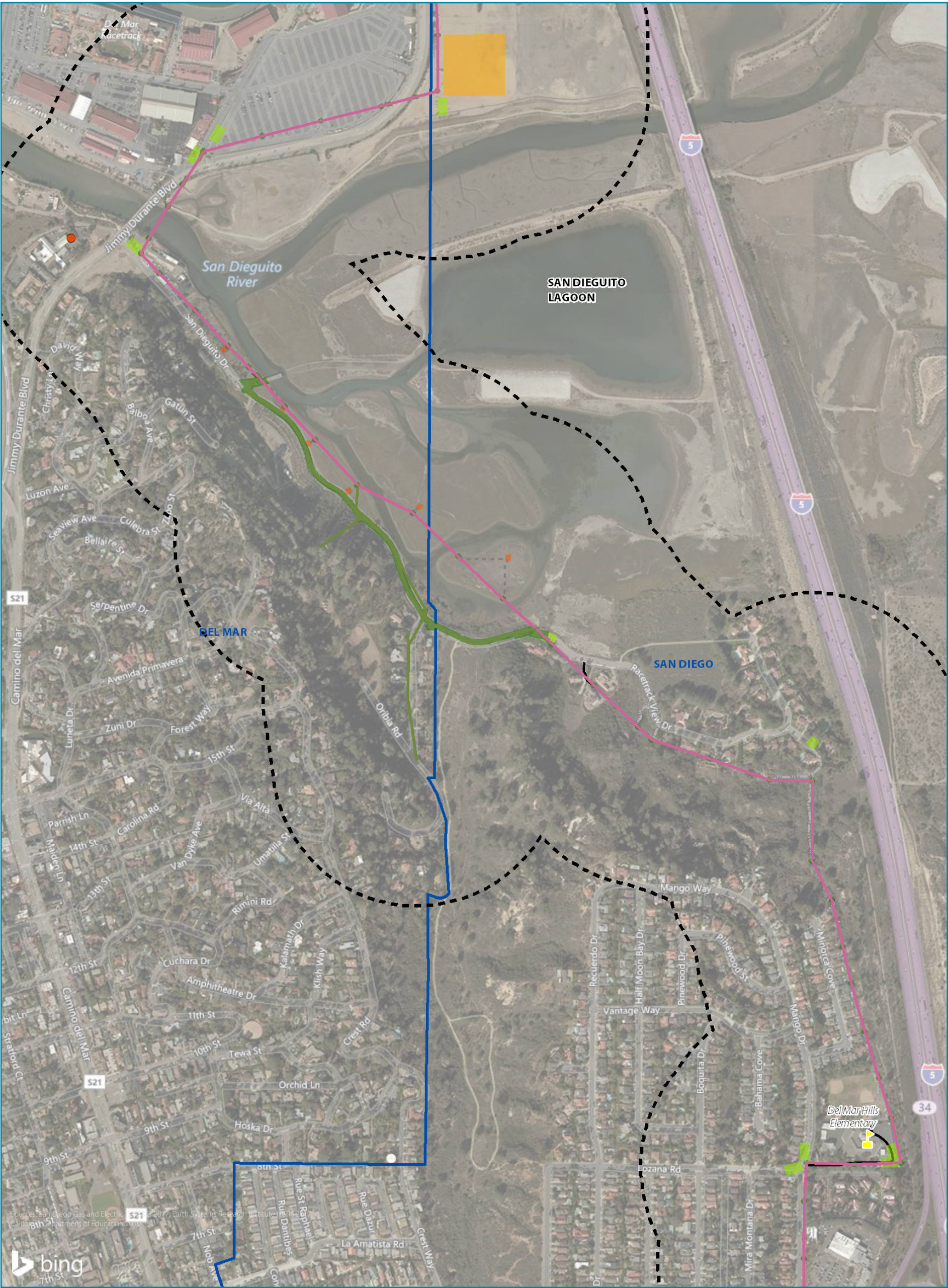


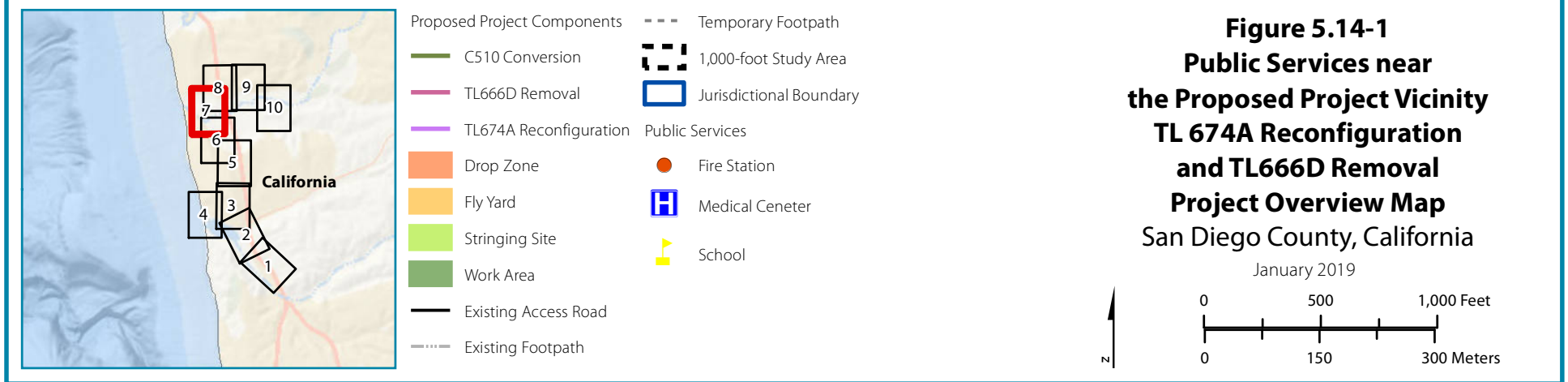
- Proposed Project Components
- C510 Conversion
 - TL666D Removal
 - Drop Zone
 - Fly Yard
 - Stringing Site
 - Work Area
 - Existing Access Road
 - Existing Footpath
 - Temporary Footpath
- 1,000-foot Study Area
- Jurisdictional Boundary
- Sensitive Receptors
- School

Figure 5.14-1
Public Services near
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019

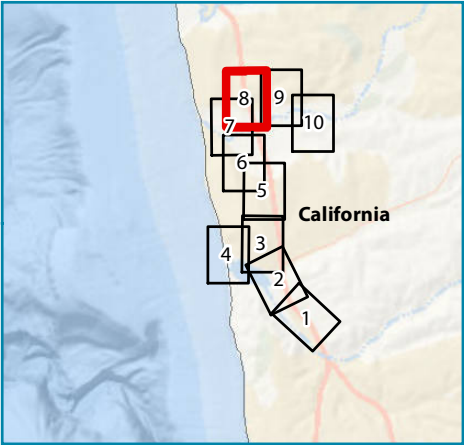








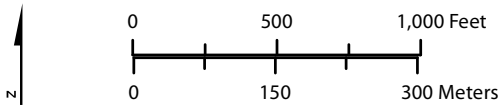
Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017; California Department of Education 2019

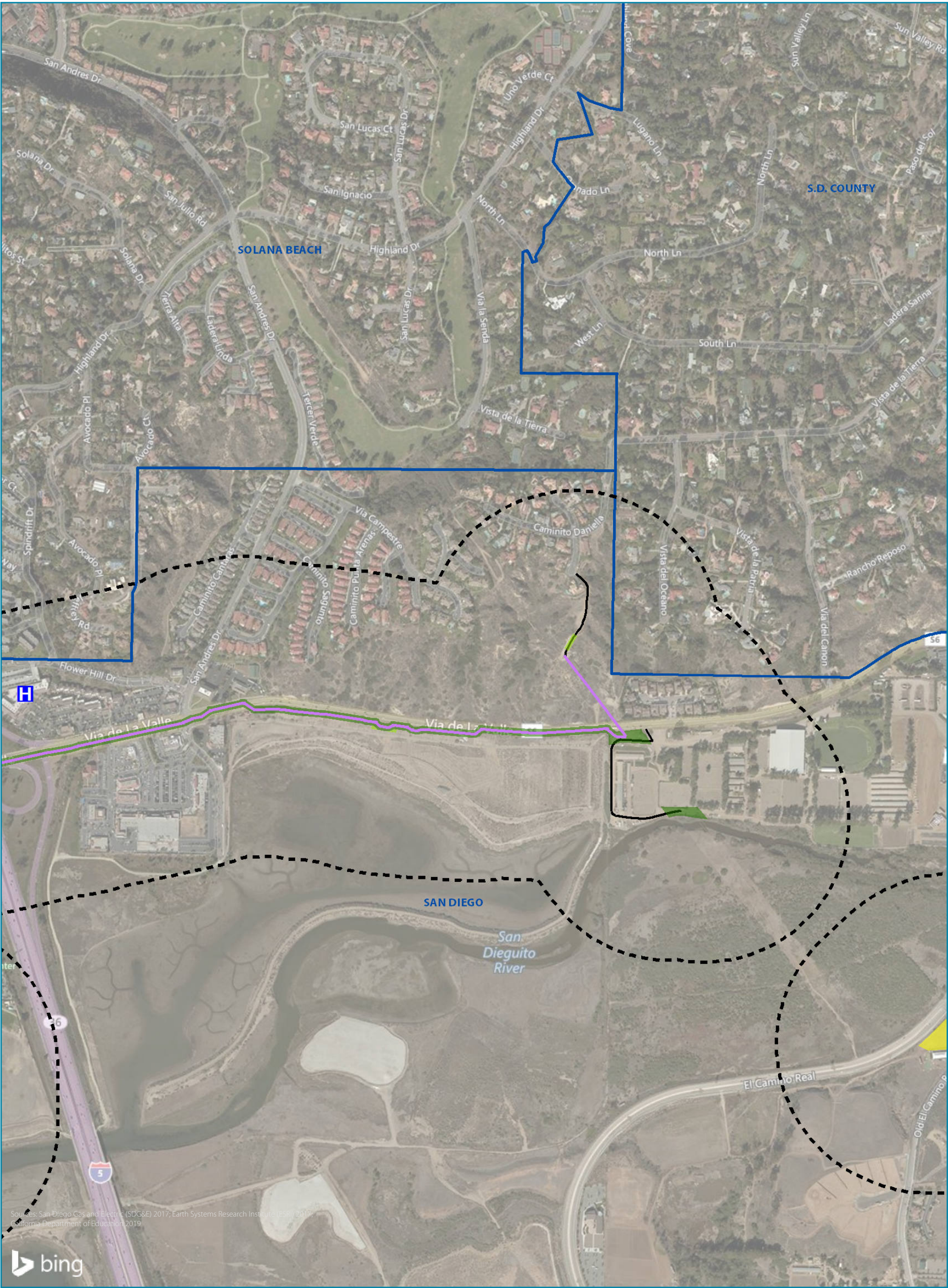


- | Proposed Project Components | Public Services |
|-----------------------------|-----------------|
| TL666D Removal | Fire Station |
| TL674A Reconfiguration | Medical Center |
| Fly Yard | School |
| Stringing Site | |
| Work Area | |
| Temporary Footpath | |
| 1,000-foot Study Area | |
| Jurisdictional Boundary | |

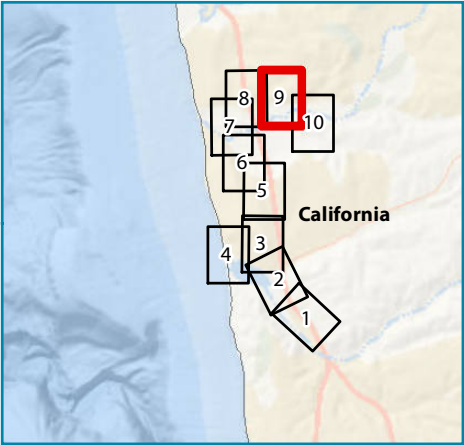
Figure 5.14-1
Public Services near
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019





Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017; California Department of Education 2019



Proposed Project Components

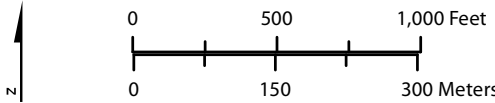
- TL674A Reconfiguration
- Staging Yard
- Stringing Site
- Work Area
- Existing Access Road
- 1,000-foot Study Area
- Jurisdictional Boundary

Public Services

- Medical Center

Figure 5.14-1
Public Services near
the Proposed Project Vicinity
TL 674A Reconfiguration
and TL666D Removal
Project Overview Map
San Diego County, California

January 2019



5.14.2 Regulatory Setting

Federal

No relevant federal regulations pertain to public services in the project area.

State

California Code of Regulations, California Fire Code

Title 24, Part 9, Chapter 33 of the California Fire Code prescribes minimum safeguards for construction, alteration, and demolition operations to provide reasonable safety to life and property from fire during such operations. The code requires that construction projects comply with fire protection measures, such as safety training, emergency reporting methods, and maintaining appropriate fire fighting vehicle access to construction sites (CBSC 2016).

Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to public services, this analysis presents local policies, ordinances, and guidelines pertinent to public services within the project area and vicinity for informational purposes.

County of San Diego Operational Area Emergency Operations Plan

The Unified San Diego County Emergency Services Organization (ESO) was formed with the purpose of assisting all of the cities and the County in developing emergency plans, exercising those plans, developing mutual aid capabilities between jurisdictions and improving communications between jurisdictions and agencies.

The ESO has prepared Operational Area Emergency Plan describes a comprehensive emergency management system which provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies and the private sector. Under Annex B, Fire and Rescue Mutual Aid Operations, any fire department can request assistance from other fire departments throughout the county. Under Annex C, Law Enforcement Mutual Aid Operations, police departments operating in the county can request assistance from other law enforcement agencies (County of San Diego 2014).

City of San Diego General Plan

The Public Facilities, Services and Safety Element of the city's General Plan addresses facilities and services that are publicly managed and have a direct influence on the location of land uses. The following policy is relevant to the proposed project (City of San Diego 2008).

- **Policy PF-K-4:** Collaborate with school districts and other education authorities in the siting of schools and educational facilities to avoid areas with: fault zones; high-voltage power lines; major underground fuel lines; landslides and flooding susceptibility; high-risk aircraft accident susceptibility; excessive noise (see also Noise Element, Table NE-3, Noise Compatibility Guidelines); industrial uses; hazardous material sites, and significant motorized emissions.

City of Del Mar Community Plan

There are no goals or policies in the city's Community Plan related to public services that are relevant to the proposed project (City of Del Mar 1976).

5.14.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

The applicant has incorporated the applicant-proposed measure (APM) below into the proposed project to minimize or avoid impacts on public services. A list of all project APMs is included in Table 4-9.

APM PS-01: No less than 60 days prior to beginning construction, SDG&E will coordinate with schools (or the appropriate school district) that are located within 250 feet of proposed project activities. These schools include the following:

- Therapeutic Learning Center
- Del Mar Hills Elementary School
- Brighter Future Preschool and Child Development Center
- Del Mar Heights Elementary School

SDG&E and the schools (or school district) will determine the best time to conduct construction activities in an effort to avoid major school events and to minimize any disruption to learning through potential nuisance during construction (i.e., access, noise, disruption). Where feasible, SDG&E will conduct construction activities outside of the scheduled school year, during seasonal breaks, outside of peak drop-off and pick-up hours for the standard school day, at night, or during weekends to reduce potential access, noise, or disruptive impacts to local schools, which could interfere with habitual learning.

Significance Criteria

Table 5.14-1 includes the significance criteria from Appendix G of the California Environmental Quality Act Guidelines' public services section to evaluate the environmental impacts of the proposed project.

Table 5.14-1 Public Services Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire Protection?

The proposed project would not increase demands for fire protection services such that new or physically altered facilities would be required. Fires are well-known risks in Southern California, and the cities of San Diego and Del Mar are adequately equipped under their respective jurisdictions to respond to these types of emergencies. Project construction could inherently pose some risk of fire or emergency events, and these risks could increase demand for emergency services. Residences and commercial businesses extensively populate the service areas in which the project utility corridor is located. The cities of San Diego and Del Mar have adequate and available firefighting and emergency response services capable of responding to fire or medical emergencies should one occur.

Further, as discussed in Section 5.8, "Hazards and Hazardous Materials," the applicant would prepare an emergency response plan outlining safety protocols and contingencies to minimize the risk of fire or harm before, during, and after project construction. Operation and maintenance of the proposed project's circuitry is anticipated to be reduced after lines TL666D and C510 are replaced and converted, when compared to existing conditions. As such, the proposed project would not require new or altered facilities and the impact would be less than significant.

Significance: Less than Significant

1 **ii. Police Protection?**

2
3 Limited law enforcement services may be required to respond to any incidences of vandalism or theft of
4 materials stored on site during construction. Existing police protection services for the cities of San Diego
5 and Del Mar are adequate to protect against vandalism and property crime and to address public safety in
6 the event of an emergency during construction. Risks of these activities would not be greater than such
7 risks at any other similar construction project and would be further reduced by the limited duration of the
8 proposed work. The project's operation and maintenance activities would not require any police
9 protection services. As such, the proposed project would not necessitate the construction of new or altered
10 police protection facilities and there would be no impact related to this criterion.
11

12 **Significance: No Impact**

13
14 **iii. Schools?**

15
16 SDG&E anticipates the proposed project's construction workforce to be sourced from the local area and
17 commute from home to the work site from nearby areas. Given this, the proposed project would not result
18 in indirect demands for new or altered schools because project-generated employment would be filled by
19 a local workforce as opposed to employees relocating to the area. Therefore, the project would not
20 directly or indirectly impact schools and there would be no impact.
21

22 The applicant proposes using Del Mar Hills Elementary School's athletic field, blacktop, and parking
23 facility as a temporary facility for helicopter activities associated with the proposed project's TL666D
24 component, and for access to five existing 69-kilovolt poles on the school's property. Over the course of
25 project construction, certain activities could temporarily restrict access to program areas of the school or
26 other sensitive receptors near project utility corridors, or create noise or other disruptive effects from
27 vehicles and other heavy construction equipment.
28

29 The applicant includes **APM PS-01** to address impacts to students and attendees at the following facilities
30 that would be located within 250 feet of a project work area: Therapeutic Learning Center, Del Mar Hills
31 Elementary School, Brighter Future Preschool and Child Development Center, and Del Mar Heights
32 Elementary School. The applicant states it would coordinate with the specific facility or school district 60
33 days prior to the commencement of construction near these facilities in order to schedule specific
34 construction work in such a manner to avoid major school events and reduce disruption, where feasible by
35 conducting construction activities outside of the scheduled school year.
36

37 The focus of a California Environmental Quality Act public services analysis is whether a project would
38 cause adverse physical impacts associated with the provision of new or physically altered governmental
39 facilities, the construction of which could cause significant environmental impacts. The proposed project
40 would not necessitate construction of new or physically altered school facilities. Project construction
41 would expose sensitive receptors to construction noise and would result in restricted access to recreation
42 facilities. These would be temporary and intermittent effects that would occur during specific phases of
43 project construction, which are addressed in detail in Section 5.12, "Noise," Section 5.15, "Recreation,"
44 and Section 5.16, "Transportation and Traffic."
45

Significance: Less than Significant

iv. Parks?

The approximately 125 contractors and construction personnel that would be employed to construct the proposed project would be sourced locally. If workers from outside the area were to temporarily relocate, some of these may use nearby parks. Because the facilities that these potential workers would use (and the intensity of such use) cannot be predicted with any certainty, it would be speculative to conclude that the proposed project's employment demands could result in demand for new or altered park space or degrade the conditions of any one facility, because no specific facility can be reasonably identified. The proposed project would therefore have no impact on parks.

Access to trails and other recreational facilities would be temporarily restricted due to construction work during the proposed project's 12-month construction period. Measures to address public access to affected recreational facilities during construction are discussed in Section 5.15, "Recreation."

Significance: No Impact

v. Other Public Facilities?

Construction may temporarily increase demand for hospital services in case a worker is injured, as is the case with any construction activity. While unlikely, existing medical facilities would be adequate to address health care needs of project contractors in the event of a construction-related emergency. No new hospital facilities would need to be constructed as a result of the proposed project, and there would be no impact under this criterion.

Significance: No Impact

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5.15 Recreation

5.15.1 Environmental Setting

A desktop-level study provided an overview of recreational facilities located within 1 mile of the project alignment. A site visit of the project alignment and its vicinity was conducted in February 2018 to make additional observations, collect data, and confirm the existing conditions of open spaces, parks, and recreational resources in the proposed project area and vicinity.

The following public agencies and private organizations collectively manage recreational lands and facilities located within 1 mile of the proposed project area:

- City of San Diego Parks and Recreation Department;
- County of San Diego Parks and Recreation Department;
- City of Del Mar Parks and Recreation Committee;
- City of Solana Beach Parks and Recreation Department;
- State of California Department of Parks and Recreation; and
- Private organizations.¹

Thirty-four recreational facilities are within 1 mile of the project area (Google Earth Pro 2016; SDG&E 2017a). Recreational facilities are defined as public or open-access facilities that are primarily sites for passive or organized activities. Passive recreational activities emphasize the open space aspects of park facilities, and includes activities such as hiking, walking, birdwatching, and picnicking. Active recreational activities are generally associated with group sports or play activities, and often require dedicated program areas such as playgrounds, ball fields, community centers, swimming pools, etc. for the intended activity. Recreational facilities that support passive and/or active recreational activities in the project vicinity include:

- State, county, city, or private parks;
- Bicycle paths;
- Open space preserves;
- Hiking trails and walking paths;
- Campgrounds; and
- Community centers.

¹ Functionally private recreational facilities such as country clubs, private golf courses, and amusement parks are not typically included in a California Environmental Quality Act (CEQA) recreation analysis; these types of uses, therefore, will not be discussed in this section, with the exception of the Surf and Turf RV Park, which would be adjacent to the proposed project's activities and to the Del Mar Fairgrounds, a public facility that is subject to a CEQA analysis with respect to recreation. Because potential impacts to both facilities would be similar, the Surf and Turf RV Park has been included in this analysis. See Table 5.15-1 for additional details.

Table 5.15-1 lists the recreational facilities in the project area, as well as the distance from the nearest project component or work area. In some instances, segments of existing project circuitry may intersect with or cross recreational facilities. Additionally, some isolated project components or work areas may be located entirely within an existing recreational facility. For a map of the recreational facilities described in Table 5.15-1, see Figure 5.15-1.

Recreational facilities that would be adjacent to, crossed by, or contained within portions of the project area include: Crest Canyon Open Space Park, Surf and Turf RV Park, Del Mar Heights School – Athletic Fields, the Del Mar Horse Park Equestrian Facility, the Del Mar Fairgrounds, Los Peñasquitos Lagoon, San Dieguito Lagoon, the San Dieguito Lagoon Ecological Reserve, San Dieguito River Park, Torrey Pines State Beach, Torrey Pines State Natural Reserve, and Sorrento Valley Pedestrian/Multi-Use Path.

5.15.2 Regulatory Setting

Federal

No federally managed recreational facilities are located within 1 mile of the project area. Therefore, no federal regulations or policies pertain to the proposed project with respect to recreation.

State

States are required to have Statewide Comprehensive Outdoor Recreation Plans in order to be eligible for federal Land and Water Conservation Fund Act grants. The 2008 California Outdoor Recreation Plan fulfills this requirement and provides a strategy for statewide outdoor recreation leadership and action to meet identified needs. The following policy is applicable to the proposed project (California State Parks 2009):

- **Preservation of natural and cultural resources:** Recreation areas should be planned and carefully managed to provide optimum recreation opportunities without damaging significant natural or cultural resources. Management actions should strive to correct problems that have the potential to damage sensitive areas and degrade resources.

Additionally, the San Diego Coastal State Park System General Plan contains policies pertaining to nine coastal state parks within the San Diego area. The Torrey Pines State Beach and State Reserve plan contains policies that are applicable to the proposed project and that are intended to address the goal of maintaining the area's recreational resource values. The policies pertain specifically to park development and not electrical transmission and distribution, and as such are not applicable to the proposed project (California Department of Parks and Recreation 1984).

Table 5.15-1 Recreational Facilities within One Mile of the Proposed Project Utility Corridor

Recreational Facility	Managing Agency	Activity/Feature	Distance (miles)	Feature ID ^(e)
21st Street Tennis Courts	Del Mar Parks & Recreation Committee	passive/active (sport)	0.28	1
Arroyo Sorrento Open Space	San Diego Parks and Recreation	passive	0.38	2
Carmel Grove Park	San Diego Parks and Recreation	passive	0.86	3
Carmel Valley Recreation Center	San Diego Parks and Recreation	passive/active (sport)	0.60	4
Carmel View Mini-Park	San Diego Parks and Recreation	passive	0.74	5
Coast View Mini-Park	San Diego Parks and Recreation	passive	0.28	6
Crest Canyon Neighborhood Park	San Diego Parks and Recreation	passive, hiking	0.35	7
Crest Canyon Open Space Park	San Diego Parks and Recreation	passive, hiking	crossed	8
Del Mar City Beach	Del Mar Parks and Recreation	active, swimming	0.39	9
Del Mar North Beach	Del Mar Parks and Recreation	passive recreation	0.50	10
Surf and Turf RV Park	Private	active, camping	adjacent	11
Del Mar Heights School ^(a)	Del Mar Union School District	active, sport/education	within	12
Del Mar Horse Park	22 nd District Agricultural Association	active, equestrian	crossed	13
Del Mar Fairgrounds	22 nd District Agricultural Association	active, fairground	adjacent	14
Del Mar Public Parkland	Del Mar Parks & Recreation Committee	passive, hiking	0.17	15
James Scripps Bluff Preserve	Del Mar Parks & Recreation Committee	passive	0.62	16
La Colonia Park	Solana Beach Parks and Recreation Commission	passive	0.39	17
Los Peñasquitos Lagoon	San Diego Parks and Recreation	passive,	crossed	18
Los Peñasquitos Canyon Preserve	San Diego Parks and Recreation	passive, hiking	0.52	19
Overlook Park ^(b)	San Diego Parks and Recreation	passive, hiking	0.11	20
Ocean Air Community Park	San Diego Parks and Recreation	passive/active (sport)	0.99	21
Powerhouse Park	San Diego Parks and Recreation	passive	0.57	22
San Dieguito County Park	San Diego Parks and Recreation	passive, hiking, sport	0.94	23
San Dieguito Lagoon	San Diego Parks and Recreation	passive, hiking	crossed	24
San Dieguito Lagoon Eco. Reserve	California Department of Fish and Wildlife	passive	crossed	25
Coast to Crest Trail ^(c)	Joint Powers Authority	passive, hiking	crossed	26
Seagrove Park	Del Mar Parks & Recreation Committee	passive	0.62	27
Solana Highlands Park	San Diego Parks and Recreation	passive/active (sport)	0.28	28

Table 5.15-1 Recreational Facilities within One Mile of the Proposed Project Utility Corridor

Recreational Facility	Managing Agency	Activity/Feature	Distance (miles)	Feature ID ^(e)
Torrey Hills Neighborhood Park	San Diego Parks and Recreation	passive/active (sport)	0.37	29
Torrey Hills Open Space	San Diego Parks and Recreation	passive/active (sport)	0.12	30
Torrey Pines Golf Course	City of San Diego	active, sport	0.64	31
Torrey Pines State Beach	California Department of Parks and Recreation	active, fishing	Adjacent ^(d)	32
Torrey Pines State Natural Reserve	San Diego Parks and Recreation	passive, hiking	crossed	33
Sorrento Valley Multi-Use Path	San Diego Public Works Department	passive, walking	crossed	34

Sources: City of San Diego 2018; County of San Diego 2018; San Dieguito River Park 2017; SDG&E 2017a, 2017b

Notes:

^(a) Athletic fields located on Del Mar Heights school grounds.

^(b) The Proponent's Environmental Assessment describes Overlook Park as North City West Open Space.

^(c) The Coast to Crest Trail is a countywide trail that is managed in segments by various agencies. The portion of the Coast to Crest Trail that would run adjacent to and intersect the proposed project is located within San Dieguito River Park, which is managed by the San Dieguito River Park Joint Powers Authority.

^(d) The Torrey Pines Fly Yard would be located within the North Beach Lot, a parking facility serving Torrey Pines State Beach.

^(e) See Figure 5.15-1.

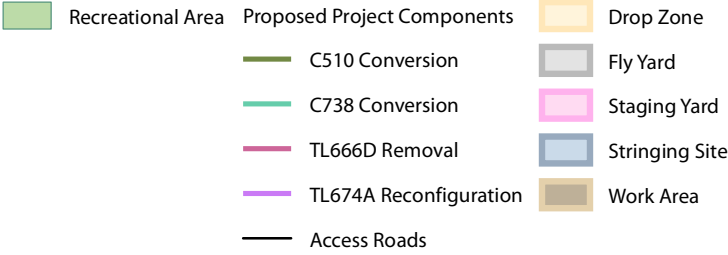
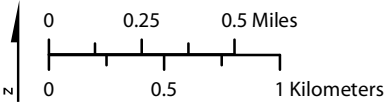


Figure 5.15-1
Recreational Areas
Within One Mile of
the Proposed Project Area
San Diego County, California
June 2018



Sources: CPAD 2017, San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2018

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Local

County and city plans, including community plans for San Diego County and the Cities of San Diego and Del Mar were reviewed for policies relevant to the proposed project and impacts as defined by the California Environmental Quality Act (CEQA). The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to recreational resources, this analysis presents local policies, ordinances, and guidelines pertinent to recreational resources and facilities within the project area and vicinity for informational purposes.

California Public Utilities Commission (CPUC) General Order 131-D, Section XIV.B, states that “local jurisdictions acting pursuant to local authority are preempted from regulating electrical power line projects, distribution lines, substations or electrical facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.”

County of San Diego

San Dieguito County Park is the only recreational facility managed by San Diego County within 1 mile of the project area. San Diego County’s General Plan Conservation and Open Space Element contains goals and policies intended to ensure that adequate park and recreational facilities will serve current and future residents. Policy COS-23.1 requires that natural resources, including those associated with recreational facilities, be accessible to the public (County of San Diego 2016).

Additionally, San Dieguito County Park and the Sorrento Valley Pedestrian/Multi-Use Path have segments of trail networks that must comply with the Community Trails Master Plan and a Regional Trail Plan. The Coast to Crest Trail is partially located within the San Dieguito Lagoon within an east-west trail corridor that spans San Diego County (County of San Diego Planning and Development Services 2005). A segment of the Coast to Crest Trail lies within the project area immediately south of the Del Mar Fairgrounds. As illustrated on Figure 5.15-1, the trail segment crosses below Interstate 5, continues between the San Dieguito River and Via de la Valle and runs adjacent to Del Mar Horse Park. Countywide Policies in the Community Trails Master Plan indicate that discretionary projects proposed on trails or pathways governed by the Regional Trail Plan or Community Trails Master Plan may be required to dedicate and improve land for trails or pathways.

The San Dieguito River Park Concept Plan contains policies pertaining specifically to the San Dieguito River Park. The plan aims to maintain the area as a contiguous system of preserved lands with walking, biking, and equestrian trails, from the ocean to the river’s source. The plan divides the park into 14 separate landscape units. Project components are within the plan’s Landscape Unit A: Del Mar Coastal Lagoon area. The plan requires that grading and construction be minimized within the natural, open-space areas within the park (San Dieguito River Park Joint Powers Authority 2002).

City of San Diego

Policies within the City of San Diego General Plan’s Recreation Element are intended to develop, preserve, maintain, operate, and enhance public recreation facilities within the city. Goals pertaining to open space lands and resource-based parks aim to maintain the natural terrain and landscape, prevent

encroachment of incompatible land uses for the purpose of maintaining and enhancing existing multi-use trail areas and ultimately establishing a contiguous system of bicycle and pedestrian paths. (City of San Diego 2015)

The city also has a Bicycle Master Plan, which contains goals and policies intended to enhance bicycle opportunities in San Diego for both recreational and transportation purposes. The Sorrento Valley Pedestrian/Multi-Use Path is a Class II Bikeway within the project area. Policy 3(d) from the Bicycle Master Plan requires that the existing city bikeway network be maintained and improved when feasible, and also requires the bicycle transportation network be routinely reviewed in environmental assessments to assess impacts (City of San Diego 2013).

City of Del Mar

The Environmental Management section of the Del Mar Community Plan lists environmental management objectives and specific recommendations pertaining to certain public areas within the community, including recreational areas. This section requires mitigation for public access impacts to San Dieguito Lagoon and the San Dieguito River. Further, the plan lists development criteria intended to preserve open space sensitivities within San Dieguito Lagoon by preserving public access to pedestrian trails and maintaining compatibility of future proposals with the lagoon environment (City of Del Mar 1985).

5.15.3 Environmental Impacts and Assessment

Applicant Proposed Measures

SDG&E proposes APM REC-01 and -02 to address notification to the managing agencies of recreational facilities and to the public of temporary access restrictions that project construction may necessitate at the parks and recreational facilities in the project area.

APM REC-01: SDG&E will post signage at access points to recreational facilities that may be subject to access restrictions due to the proposed project no less than four weeks prior to the beginning of construction activities within or adjacent to the facilities. These facilities will include Torrey Pines State Natural Reserve, Torrey Pines State Beach, Del Mar Horse Park, and Sorrento Valley Pedestrian/Multi-Use Path. This signage will notify users of the impending construction activities; construction impacts (e.g., increased noise and dust); the affected locations; and the estimated duration of any necessary temporary closures or access restrictions. Contact information for the proposed project's public liaison will be provided on the signage, and the public liaison will address any complaints related to dust, noise, and access restrictions.

APM REC-02 (Revised by SDG&E in response to Data Request 01 by the CPUC [SDG&E 2017c]): Authorities representing facilities where access restrictions may occur (i.e., the California Department of Parks and Recreation and the City of San Diego) will be contacted and given advance notice of project activities no less than eight weeks prior to construction. SDG&E will also coordinate with the 22nd District Agricultural Association that manages and operates the Del Mar Horse Park no less than eight weeks prior to construction to minimize potential impacts to the facility and its users during construction.

~~APM REC-02 (Revised)~~, as revised in response to Data Request 01 by the CPUC (SDG&E 2017e), the applicant would notify authorities and managing agencies of recreational facilities of project activities no less than eight weeks prior to construction to ensure that the facility users are duly informed of service restrictions and or disruptions.

Significance Criteria

Table 5.15-2 includes the significance criteria from Appendix G of the CEQA Guidelines' recreation section to evaluate the environmental impacts of the proposed project.

Table 5.15-2 Recreation Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?*

The proposed project would directly alter the physical conditions within portions of two recreation facilities to accommodate construction staging, materials storage and helicopter uses associated with TL666D activities, including the removal of utility poles. The proposed project's Torrey Pines Fly Yard would be located in the North Beach Parking Lot at Torrey Pines State Beach. The Del Mar Heights Fly Yard would be located within the outdoor athletic field at Del Mar Heights Elementary School (Del Mar Heights School – Athletic Fields).

The applicant would use gravel as needed to level surfaces at Del Mar Heights Fly Yard. The yard would be located atop an existing softball field. In the context of criterion (a), above, the temporary use of Del Mar Heights School's softball field for the purpose of equipment staging during project construction could potentially cause physical deterioration of the facility associated with truck trips, material deposition, compaction, etc. At the Torrey Pines North Beach Lot, SDG&E proposes using the existing surface parking lot as a construction vehicle staging area and fly yard for helicopter operations.

These construction activities would restrict public access to the parking lot during active construction use. To prevent the potential for physical degradation to the facility or incidental damage to natural features in and around the park environment, the applicant shall incorporate **MM REC-1**. This measure would require the applicant to document pre-project conditions at both the Torrey Pines Fly Yard and Del Mar Heights Fly Yard, and to restore each space to conditions matching those at the onset of the proposed

project. If it is determined that construction-related activities have substantially degraded the physical conditions either site, the applicant would restore work areas to pre-existing conditions.

MM REC-1: Documentation of Conditions. The applicant shall photograph pre-project conditions at the Torrey Pines and Del Mar Heights Fly Yards from multiple viewpoints to adequately represent pre-construction conditions at both sites. The applicant shall submit a portfolio of these images to CPUC staff and to appropriate representatives of Del Mar Heights Elementary School and Torrey Pines State Beach prior to the use of either facility for construction-related purposes.

Upon completion of project construction, the applicant shall restore the fly yard sites to pre-project conditions and submit a portfolio of “before and after” photographs documenting physical conditions of each site, as applicable. The portfolio of images shall be submitted to the CPUC and to designated agents on behalf of Del Mar Heights School and Torrey Pines State Beach parking facility to ensure that the affected facilities are returned in satisfactory condition.

Project operations would involve routine and emergency maintenance, along with aerial and ground inspections at least once per year. No substantial increase in operation and maintenance activities compared to those occurring under existing conditions are anticipated following project completion. Reconfiguring Line C510 from an overhead to an underground alignment would eliminate the need to maintain this overhead line and maintenance activities would be restricted to its underground duct bank and associated risers. Removal of line TL666D would eliminate the need to conduct maintenance work on this line within Torrey Pines State Natural Reserve and within the San Dieguito Lagoon. Because the proposed project would involve the realignment of existing facilities with similar operations and maintenance requirements, the proposed project is not be expected to increase the use of recreational facilities such that substantial physical deterioration would occur.

Significance: Less than Significant with Mitigation Incorporation

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?

The proposed project would entail reconfiguration and removal of electrical infrastructure and no new or expanded recreational facilities would be constructed as part of the proposed project. Therefore, the proposed project would not result in adverse physical changes to the environment related to the construction or expansion of recreational facilities, and no recreational impacts would occur.

Construction activities may temporarily limit the public’s use of existing recreational facilities in the project area due to intermittent access disruptions caused by vehicle movement, materials staging, and site-specific safety and spatial requirements during the proposed project’s anticipated 12-month construction period. The nearly 8-mile-long utility corridor extends across or runs adjacent to various recreational sites that would be occupied at least temporarily by construction vehicles that could limit or completely restrict access to facilities intermittently during construction. Figure 5.15-1 illustrates the facilities, including Del Mar Heights School, Torrey Pines State Beach, and others where temporary work spaces and buffer zones established for public safety may temporarily restrict public access and use of recreational facilities.

SDG&E proposes **APM REC-01** and **APM REC-02** to address advance notification to recreational facilities managers and the public related to temporary access restrictions that may be required at certain facilities during construction. Moreover, as presented in Section 5.14, “Public Services,” **APM PS-01** directs the applicant to coordinate with schools within 250 feet of project construction areas at least 60 days prior to construction commencing. The advance notice is intended to provide school officials sufficient time to develop alternate program activities as needed during the period when access to Del Mar Heights School’s athletic fields would be restricted.

Significance: Less than Significant

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- 6 _____. 2017c. Responses to Data Request #1 for the TL674A Reconfiguration and TL666D
7 Removal Project
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10 [Lagoon.pdf](http://www.sdrp.org/wordpress/wp-content/uploads/17.08.16-Trail-Map-San-Dieguito-Lagoon.pdf) . Accessed January 30, 2018.
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12 Available at <http://www.sdrp.org/wordpress/wp-content/uploads/SDRP-Concept-Plan.pdf> .
13 Accessed December 18, 2018.

5.16 Transportation and Traffic

5.16.1 Environmental Setting

Regional Access

Regional access to the project area's roadway network is via Interstate Highway 5 (I-5), which runs from the United States–Mexico border in the south and links the cities of Del Mar and San Diego to Solana Beach and more distant points north. A portion of I-5 is directly within the project area, where the TL666D utility corridor intersects the highway between Sorrento Valley Road (exit 30) and Carmel Mountain Road (exit 32). Approximately 640 feet of existing 12-kilovolt (kV) overhead line spans 12 lanes of traffic to connect to an existing underground alignment on the east side of I-5.

Local Streets and Roadway Network

Local roads within the cities of San Diego and Del Mar constitute the existing roadway network in the proposed project area, as shown in Figure 5.16-1. The proposed project would be located within existing right-of-way (ROW) portions of the following local streets where its underground components would be installed or that would serve as access roads to work areas adjacent to the proposed project:

- Carmel Mountain Road
- Carmel Valley Road
- Del Mar Heights Road
- I-5 (at Carmel Mountain Road)
- I-5 (at Villa De La Valle)
- Jimmy Durante Boulevard
- Mango Drive
- Minorca Cove
- Minorca Way
- Mira Montana Place
- Portofino Drive
- Racetrack View Drive
- Racetrack View Court
- San Andreas Drive
- San Dieguito Drive
- Via De La Valle
- Via Nestore
- Via Pisa

Public Transit

Rail

The proposed project would not cross or span any active railway line. The nearest passenger rail service is located approximately 790 feet west of the TL666D corridor. The North County Transit District's (NCTD's) Coaster and California Department of Transportation (Caltrans)/Amtrak's Pacific Surfliner operate passenger rail services along this corridor. The Coaster links North County and the city of San Diego with more than 20 trains operating during the workweek and an additional 10 trains on Saturdays. The Pacific Surfliner runs multiple trains daily between San Luis Obispo and San Diego.

Bus

The San Diego Metropolitan Transit System and the NCTD provide bus service within the cities of Del Mar and San Diego. NCTD operates 30 daily runs (15 eastbound and 15 westbound Monday through

Friday) of route 308, which provides access to the project area from Via De La Valle near the northeastern portion of the proposed project's reconfiguration of TL674A. The nearest bus stop on Route 308 adjacent to the TL674A alignment is at the Via De La Valle and Flower Hill station. These bus routes are shown on Figure 5.16-1. There are no transit bus stops or bus routes in the eastern portion of the project alignment.

NCTD's BREEZE bus route 101 operates parallel to the project alignment on Camino del Mar and North Torrey Pines Road, which is not on street segments where SDG&E would conduct work in the ROW for the proposed project.

Aviation

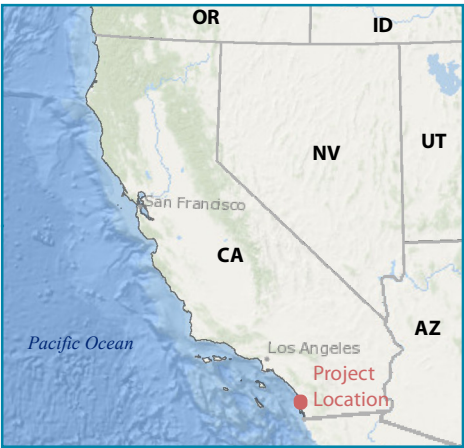
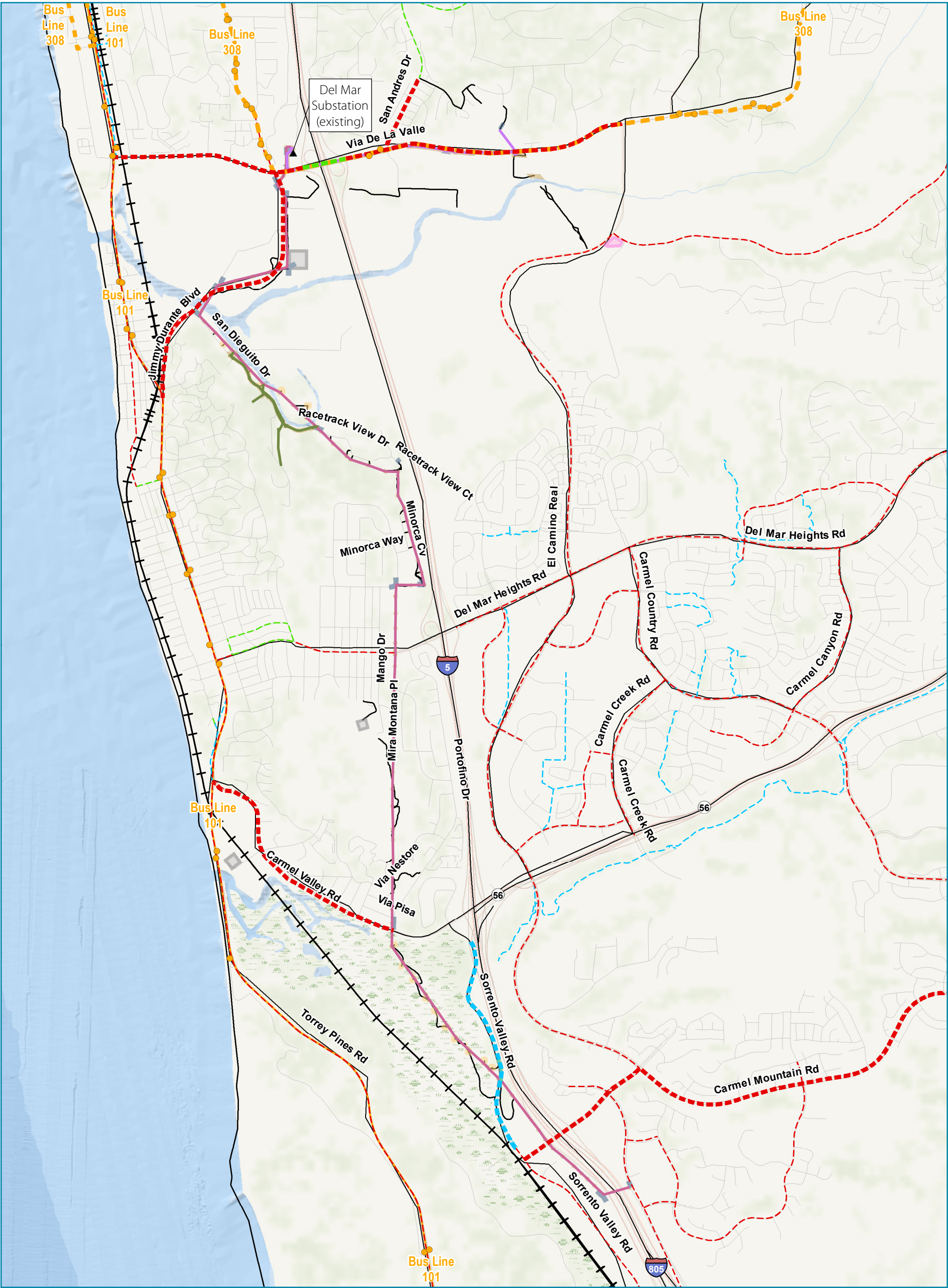
The nearest airport to the proposed project is McClellan-Palomar Airport, located approximately 10.4 miles northeast of the proposed TL674A component. San Diego County operates McClellan-Palomar Airport, which accommodates approximately 430 daily arrivals and departures from a single 4,900-foot-long runway. The proposed project would be outside of any potential imaginary slope extending from this runway, as defined by the Federal Aviation Administration (FAA) (14 Code of Federal Regulation [CFR] 77).

Bicycle Facilities

Caltrans characterizes *bikeways* in three groups as follows:

- ***Class I Bikeway (Bike Path).*** A Class I Multi Use Path provides a completely separated right of way for the exclusive use of bicycles and pedestrians with cross-flow minimized.
- ***Class II Bikeway (Bike Lane).*** A Class II Bike Lane provides a striped lane for one-way bike travel on a street or highway.
- ***Class III Bikeway (Bike Route).*** A Class III Bike Route is a signed shared roadway that provides for shared use with pedestrians or motor vehicle traffic, typically on lower volume roadways. There is nothing different about the roadway, only that it has signs posted identifying it as a bike route. (Caltrans 2016)

Several bicycle facilities exist within the project area. In the city of San Diego, the proposed TL674A reconfiguration alignment would run along Via De La Valle, which accommodates a Class II designated bicycle lane. Carmel Valley Road, Carmel Mountain Road, and a segment of Del Mar Heights Road also function as designated Class II bicycle lanes and would intersect the TL666D utility corridor near its intersections with Portofino Drive, I-5, and Mango Drive. Sorrento Valley Road functions as a designated Class II bicycle lane and transforms into a Class I bicycle/pedestrian-only pathway at the intersection with the TL666D corridor. The City of San Diego considers this segment of Sorrento Valley Road a Class I bike path. The Sorrento Valley Pedestrian/Multi-Use Path is used as a bicycle path and continues from the northern end of Sorrento Valley Road. This path would parallel the construction activities associated with converting the existing C738 overhead power line to an underground configuration as part of the proposed project. Furthermore, Jimmy Durante Boulevard, which is partially within the city of San Diego and the city of Del Mar, is functionally a Class II bicycle facility in both places. The TL666D removal would span Jimmy Durante Boulevard at several locations, oscillating between the city of San Diego and the city of Del Mar. These bicycle routes are depicted in Figure 5.16-1.



- Routes Crossed by the Proposed Project

 - Class 1: Multi-Use Path
 - Class 2: Bike Lane
 - Class 3: Bike Route
 - Bus Line 308

Routes not Crossed by the Proposed Project

 - Class 1: Multi-Use Path
 - Class 2: Bike Lane
 - Class 3: Bike Route
 - Bus Routes
- ▲ Del Mar Substation (existing)

● Transit Stops

— Railroad

Proposed Project Components

 - C510 Conversion
 - C738 Conversion
 - TL666D Removal
 - TL674A Reconfiguration
 - Access Roads
- Drop Zone

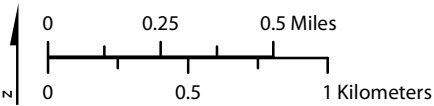
Fly Yard

Staging Yard

Stringing Site

Work Area

Figure 5.16-1
Bikeways and Transportation
in the Proposed Project Vicinity
TL674A Reconfiguration and
TL666D Removal
San Diego County, California
June 2018



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5.16.2 Regulatory Setting

Construction projects that cross transportation corridors are subject to federal, state, and local conditions in encroachment permits. Permits are also required for activities that result in the use or obstruction of navigable airspace. The following subsections summarize transportation and traffic regulations that are applicable to the construction of electric facilities, such as the proposed project.

Federal

Federal Aviation Administration

The FAA, an agency that is part of the U.S. Department of Transportation, is responsible for regulating civil aviation, including the oversight of air traffic and aeronautical obstructions. All airports and navigable airspace not administered by the U.S. Department of Defense are under the jurisdiction of the FAA.

The FAA requires applicants to submit a Notice of Proposed Construction or Alteration and receive approval prior to ground disturbance associated with a project. Title 14 Section 77.13 defines an aviation obstruction as any equipment at or in excess of 200 feet above the ground that would exceed an imaginary surface extending outward and upward from applicable airport runways at slopes of 100:1 within 20,000 feet of an applicable runway, 50:1 within 10,000 feet of an applicable runway, and 25:1 within 5,000 feet of an applicable runway (FAA 2011). The FAA also has restrictions on helicopter flights carrying external loads in congested areas (e.g., city, town, or open-air assembly of people). Helicopter flights with external loads in congested areas require the applicant/operator to submit a “Congested Area Plan” to the FAA (14 CFR Part 133.33) (FAA 2013).

State

California Department of Transportation

Caltrans is responsible for overseeing state highways within California. Caltrans requires that an encroachment permit be obtained for all work done within a state highway ROW. Encroachment permits must also be obtained for transmission lines that span any state roadway (Caltrans 2018). In addition, Caltrans has the discretionary authority to issue special permits for the movement of vehicles or loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in California Vehicle Code.¹ Completion of a Transportation Permit application is required for requests ~~for~~ of such special permits (DMV 2015).

Since the California Public Utilities Commission has exclusive jurisdiction over the siting, design, and construction of the proposed project, it is not subject to local discretionary regulations. Caltrans reviews all requests from utility companies that plan to conduct activities within its ROW. Furthermore, encroachment permits may include conditions that limit when construction activities can occur within or above roadways under the jurisdiction of Caltrans.

Relevant transportation policies and ordinances are presented in Table 5.16-1.

¹ see State of California Vehicle Code, Chapters 1–5, Division 15.

Table 5.16-1 Relevant Transportation Policies and Regulations

Policy/Regulation	Description
California Department of Transportation	
Work in state ROW	An applicant must obtain an encroachment permit for all proposed activities related to the placement of encroachments within, under, or over the state highway ROW. ^(a) The applicant must obtain a special permit to operate a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations on state highways. Maximum limitations are generally as follows: width = 102 inches, height = 14 feet, length = 75 feet, weight = 80,000 lbs. ^(b)
City of San Diego	
Work in public ROW	Municipal Code Chapter 12, Article 9, Division 7: Public ROW Permits of the City of San Diego Municipal Code addresses the use of or encroachment into public ROWs for private uses. The city requires approval of a Public ROW Permit for the construction of privately owned structures or facilities within the public ROW. ^(c)
General Plan Mobility Element	Policy ME-A.5: Adequate sidewalk widths and clear paths of travel should be provided for pedestrian usage, and obstructions and barriers that inhibit pedestrian circulation should be minimized. ^(d)
City of Del Mar	
Work in public ROW	Municipal Code Title 23, Section 28: The City of Del Mar requires the receipt of an Access Permit for construction activities performed by a Public Utility within public ROWs. The Public Works Department reviews Access Permits following submittals. The City of Del Mar utilizes guidelines prepared by the San Diego Traffic Engineers' Council and the local chapter of the Institute of Traffic Engineers for traffic impact studies. ^(e)

Sources:

(a) California Department of Transportation, Encroachment Permits (Caltrans 2018)

(b) California Vehicle Code § 35100-35111; 35250-35252; 35400-35414; and 35550-35558. Streets and Highways Code § 670-695

(c) City of San Diego Municipal Code (City of San Diego 2018)

(d) City of San Diego General Plan Mobility Element (City of San Diego 2015)

(e) City of Del Mar Municipal Code (City of Del Mar 2003)

Key:

lbs pounds

ROW right-of-way

Environmental Quality: Transit Oriented Infill Projects, Judicial Review Streamlining for Environmental Leadership Projects et al. (Senate Bill 743)

Adopted in 2013, California Senate Bill (SB) 743 represents a new paradigm in transportation planning across the state. The law changes how transportation impacts are measured in the review of plans and projects under the California Environmental Quality Act (CEQA). SB 743 eliminates automobile delay—typically measured by traffic level of service (LOS)—as the analytical metric used to determine the significance of transportation impact.

The State's Office of Planning and Research (OPR) has issued guidelines for jurisdictions to consider using a Vehicle Miles Traveled (VMT) metric instead. VMT measures the amount and distance people drive by personal vehicle to a destination. Typically, development projects that are farther from other, complementary land uses (such as a business park far from housing) and in areas without transit or active transportation infrastructure (bike lanes, sidewalks, etc.) generate more driving than development near complementary land uses with more robust transportation options. The new measurement metric is intended to better address a number of important state goals, including:

- Reducing greenhouse gas emissions;

- Developing multimodal transportation networks (i.e., networks that serve a variety of users including pedestrians, bicyclists, transit riders and drivers); and
- Promoting diversity of land uses (i.e., neighborhoods and cities with housing, jobs, shops and services in close proximity to each other).

To determine whether VMT impacts are significant, the Office of Planning and Research generally recommends a threshold of 15 percent below the VMT per capita of the surrounding region and/or city. The OPR acknowledges that this threshold is intended to achieve general consistency with both the Caltrans statewide target for VMT reduction (15 percent by 2020) and the urban regional targets for greenhouse gas emissions reductions established under SB 375 (13 to 16 percent for passenger vehicles by 2035).

Local

San Diego General Plan Mobility Element

The Mobility Element of the City of San Diego General Plan provides measures for improving the efficiency of the city's transportation system and facilitates the long-term planning required to improve mobility through the development of a balanced, multi-modal transportation network, while minimizing potential environmental and neighborhood impacts. The Mobility Element aims to create a system where each mode of transportation contributes to an overall goal of providing transit services that meet varied user needs, while implementing a strategy to reduce traffic congestion and provide increased transportation choices with consideration for varying land use types (City of San Diego 2015). Relevant policies include:

***ME-A.5.** Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.*

a. Minimize obstructions and barriers that inhibit pedestrian circulation.

City of Del Mar Municipal Code

Title 23, Section 28 of the City of Del Mar Municipal Code sets forth standards and procedures for reviewing requests to use or encroach into public ROWs. The city requires the receipt of an Access Permit for construction activities performed by a Public Utility (including SDG&E) within public ROWs. The Public Works Department reviews Access Permits following their submittal.

5.16.3 Environmental Impacts and Assessment

Applicant Proposed Measures

The applicant has incorporated the following measures (APMs) into the proposed project to specifically minimize or avoid impacts to transportation, circulation, and traffic during the proposed project's construction period. A list of all project APMs is included in Table 4-9 in Section 4.0, "Project Description."

APM TRA-01: At least 30 days prior to construction of the proposed project, SDG&E will coordinate with the Del Mar Fire Department and the San Diego County Sheriff's Department to

inform them of the planned lane closures along Jimmy Durante Boulevard and to minimize potential disruptions to emergency vehicle response times.

APM TRA-02: At least 30 days prior to construction of the proposed project, SDG&E will coordinate with the North County Transit District on the planned construction activities, including the timing and duration of construction in the vicinity of existing bus stops along Via De La Valle. This coordination will include the identification of potential temporary relocation of bus stops in order to maintain service during construction. At least 10 days prior to the bus stop closure, SDG&E will post signs near any affected bus stops to notify bus riders of any potential modifications the standard bus schedule, alternate stops in the area, and a phone number to call to obtain more information.

Significance Criteria

CEQA guidelines for traffic impact analysis are under revision by the OPR to reflect the use of a VMT metric as opposed to level of service (LOS), consistent with provisions in SB 743. The OPR developed preliminary discussion draft guidelines for the use of VMT in CEQA impact analysis. In 2017, OPR prepared a *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which contains the OPR's technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures (OPR 2017). The proposed project represents a modification to the existing local electrical distribution network. The proposed project is not considered a new land use and therefore would not generate or contribute substantial new vehicle trips to the transportation network.

The proposed project would generate vehicle trips associated with construction activities over the approximately 12-month construction period. The number of daily construction trips distributed to project area roadways would vary based on the specific types of construction activity scheduled on a given day. Where existing models or methods are not available to estimate a particular project's VMT, a lead agency may analyze the project's [VMT] qualitatively. Further, "[f]or many projects, a qualitative analysis of construction traffic may be appropriate." (OPR 2017)

The proposed project's potential transportation and circulation effects are evaluated in light of the thresholds of significance in Table 5.16-2 from Appendix G of the CEQA Guidelines' transportation section.

Table 5.16-2 Transportation and Traffic Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Table 5.16-2 Transportation and Traffic Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, 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?

Project construction would encroach on sidewalks and other pedestrian pathways, which could limit or restrict pedestrian access and use of these spaces while machinery or construction crews are working in the area. Policy ME-A.5 of the Mobility Element of the City of San Diego General Plan states that adequate sidewalk widths and clear paths of travel should be provided for pedestrian usage, and obstructions and barriers that inhibit pedestrian circulation should be minimized. Construction of the proposed project would result in temporary sidewalk closures; however, alternative pedestrian walking routes around construction areas would be identified and provided. Vaults and hand holes would be placed underground, and any aboveground fixtures would be placed so that they would not obstruct pedestrian circulation in the project area. Moreover, given that construction work would be temporary and highly localized, impacts associated with temporary closure or limitations to publicly accessible sidewalks or pedestrian pathways would not represent a substantial alteration of the physical transportation system or affect its long-term use. Thus, the proposed project's construction activities would not conflict with relevant circulation plans or policies such as Policy ME-A.5 establishing measures of effectiveness for the performance of the circulation system, and impacts would be less than significant.

The proposed project's operation and maintenance activities would be similar to those currently under existing conditions except for in those areas where facilities would be removed, maintenance, inspection

and repair work (which currently necessitates vehicle trips and crew access to towers in the field) would be reduced or eliminated. Future operation and maintenance needs would continue to comply with applicable plans, policies, and ordinances that establish measures of effectiveness for the performance of the circulation system. Therefore, impacts under this criterion would be less than significant.

Significance: Less than Significant.

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

CEQA guidelines for traffic impact analysis are being revised by the California OPR to reflect the use of VMT metrics rather than LOS, consistent with SB 743. As discussed under “Significance Criteria,” above, an analysis of congestion management is no longer determined by the use of the LOS standards and delay is no longer considered to constitute a significant effect on the environment.

This analysis examines VMT impacts qualitatively during peak construction periods by using the maximum daily construction employee, truck, and delivery counts to evaluate a worst-case scenario. The proposed project would not involve land use changes that generate vehicle trips and would create a permanent source of traffic or alter VMT in the area. Project trips would entail home to worksite journeys (two trip ends daily) and construction vehicle trips from one of four staging areas (staging/fly yards) to a work site that would be located in one of the four utility corridors described in ~~Section~~ Chapter 4.0, “Project Description.”

Up to 50 workers would be employed at one component during peak construction of the proposed project, with up to 125 personnel dispersed across and active in the project area. To minimize traffic disruptions, the construction activities would start at 7:00 a.m., meaning workers would commute locally to and from the job site before the morning peak commute period, and complete their shifts before the evening peak commute period would begin (5:00 p.m.). Employees and personnel would also be encouraged to car pool to construction staging yards (accessible via San Dieguito Road, El Camino Real, and Old El Camino Real, Jimmy Durante Boulevard, Mira Montana Place, Carmel Valley Road, and Torrey Pines Road) where crews could park off-street at the beginning of the morning shift.

The goals of San Diego’s Mobility Management programs are to reduce traffic congestion and enhance mobility. The number of proposed project construction trips would fluctuate throughout the expected 12 months of construction, with an average of approximately 100 vehicle trips per day during peak activity. Generally, the more intensive construction work would be completed along Via De La Valle, Jimmy Durante Boulevard, and San Dieguito Drive. Therefore, construction trucks and equipment entering temporary work areas from these roadways could cause temporary increases in traffic (and the likelihood for intermittent delay) during construction.

The majority of underground work areas, stringing sites, 69-kV line removal, and guard structure installation sites would occur on or would be accessible from the following streets (with lane capacity and configuration shown parenthetically): Via De La Valle (single travel lane in each direction); Jimmy Durante Boulevard (two travel lanes in each direction); Racetrack View Drive (single travel lane in each

direction); and San Dieguito Drive (single travel lane in each direction). Lane closures along Via De La Valle, Racetrack View Drive, and San Dieguito Drive (single lane in each direction) could cause congestion and delay along portions of these roadways where vehicles would be held in queue while opposing traffic would use the non-affected travel lane in a contra-flow direction to divert around construction crews and work areas. The applicant indicates that intensive construction activities would be scheduled during non-peak commute hours to minimize vehicle queuing on these roadways to the extent feasible.

SDG&E would also coordinate with the cities of San Diego and Del Mar to acquire the necessary encroachment, traffic control, and access permits for construction work in the public right of way prior to construction. Issuance of these permits may require developing a traffic control plan to reduce potential temporary and intermittent impacts associated with construction. The traffic control plan would include measures to allow for safe vehicle passage and adherence to the California Manual on Uniform Traffic Control Devices, as well as avoiding queuing by trucks on Via De La Valle, Jimmy Durante Boulevard, and San Dieguito Drive entering temporary work areas. SDG&E's construction crew and contractors would be required to adhere to all conditions set forth in the encroachment and traffic control permits that would be addressed in the traffic control plan. As such, given the temporary nature of the project it would not conflict with relevant circulation plans or policies establishing measures of effectiveness for performance of the circulation system. This impact would be less than significant.

For reasons previously stated, maintenance of project circuitry over the long-term is not expected to conflict with relevant circulation plans or policies establishing measures of effectiveness for the performance of the circulation system. Activities during operation and maintenance would continue to be conducted in the same manner as prior to construction, albeit it with lesser frequency and intensity, and there would be no impact.

Significance: Less than Significant.

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?

FAA Title 14 Section 77.13 states that an aviation obstruction would be created if any equipment is positioned such that it would be more than 200 feet above the ground or exceeds an imaginary surface extending outward and upward from applicable airport runways at the following slopes: 100:1 within 20,000 feet, 50:1 within 10,000 feet, and 25:1 within 5,000 feet. The proposed project would not involve the use of tall construction equipment with the potential to affect air traffic patterns by way of an aviation obstruction. The proposed project would result in the installation of new steel poles to heights of 85 feet above ground surface, which would not be considered obstructions and would be located at a distance from the nearest airport where imaginary surfaces and vector restrictions would not apply per the FAA definition.

To reduce the possibility of project-related interferences with navigation signal reception during construction, the applicant, pursuant to Part 77 of the CFR, would conduct an FAA Obstruction Evaluation prior to commencing with project construction. Although not anticipated, should poles be

identified as a potential hazard, SDG&E would implement all recommendations included in the FAA evaluation.

Helicopters would be employed for up to 10 days to support the removal process of the 69-kV conductors and poles in areas where access limitation would prevent the use of ground-based crews for removal. Wood poles may potentially be removed and transported offsite by flatbed truck or helicopter for disposal at an approved facility. If helicopters are used during transport of wood poles, the applicant would adhere to the FAA regulations that restrict helicopter flights carrying external loads in congested areas (e.g., city, town, or open-air assembly of people) which is included in a Congested Area Plan that SDG&E would submit to the FAA (14 CFR Part 133.33).

The helicopters used for the proposed project would be staged out of local airports (e.g., Montgomery-Gibbs Executive Airport, Gillespie Field Airport, or McClellan-Palomar Airport). Generally, the helicopter flights would be limited to SDG&E's existing ROW. However, in instances where departures from the ROW are necessary, helicopters would take the most direct and feasible route between the ROWs and supporting landing zones at construction fly yards to minimize safety risks.

FAA regulations also require coordination with local air traffic control for operation in controlled airspace, and specify requirements for pilot qualifications, aircraft worthiness, and FAA-approved practices and equipment, where applicable. FAA regulations, including coordinating with air traffic control, would prevent conflicts with civilian air traffic and avoid safety risks to local residential communities from temporary helicopter use, which would be less than significant in its use during project construction.

After implementation of the proposed project, normal operation of the local electrical grid would not require helicopter use. Therefore, no long-term air traffic impacts associated with project operation and maintenance would occur.

Significance: Less than Significant.

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)?

Project construction would not include design features, activities or incompatible uses that would substantially increase hazards on publicly accessible roads in the project vicinity. The project would not alter the design of public streets or introduce incompatible land uses that would substantially increase hazards. During the proposed project's construction period, construction work could temporarily impact normal roadway operations associated with truck and equipment movement from staging areas to specific work locations along affected streets.

Work in Public Roadways

SDG&E would install temporary guard structures or take other measures (e.g., temporary halting traffic) along roadways to delineate a safe path of travel for vehicles around work sites and crew and to prevent conductors from falling onto motorists. The installation of guard structures may require a temporary

closure of the travel lane nearest the location where guard structures would be installed in order to ensure crew work zones area safely set back from moving vehicles.

Lane closures also would be required for the installation of underground duct banks along Via De La Valle, San Dieguito Drive, Jimmy Durante Boulevard, and Racetrack View Drive. This could result in impacts to motorists and to construction crews if appropriate safety measures are not in place. SDG&E would be required to obtain a Traffic Control Permit before starting construction or repair of curbs, gutters, sidewalks, commercial and residential driveways, roadway surfaces, retaining walls, culverts, streetlight(s) or other work of any nature in the County right-of-way. Standard conditions for issuing traffic control permits include providing safe work areas for workers within the public right-of-way (ROW) while maintaining a safe and efficient flow of traffic for all road users including motorists, bicyclists, and pedestrians. Thus, compliance with the encroachment and construction permit conditions from the City of San Diego and Access Permit from the City of Del Mar require implementation of measures that would avoid potential hazards associated with temporary lane closures and as such, this impact would be less than significant.

Del Mar Substation Work Area Access

SDG&E personnel and construction crew members would typically meet and park personal vehicles at one of the project's staging area/fly yards. From these locations, crew trucks and other vehicles would travel to and park within the existing Del Mar Substation parking lot. However, some temporary parking south of the Del Mar Substation along Via De La Valle may be required depending on construction activities occurring each day. The additional temporary parking would allow for safe maneuvering of equipment and material deliveries into the substation during peak construction periods.

While the actual number and type of vehicles required for the proposed circuit breaker removal and replacement at Del Mar Substation would vary depending on daily construction activities, it is anticipated that a maximum of approximately 12 vehicles would be onsite at one time. Vehicle access to the Del Mar Substation would occur from west-bound travel along Via De La Valle (a paved public roadway characterized in the San Diego General Plan Mobility Element as a two-lane community collector with continuous turning lanes in the project area) and turning right into SDG&E's existing private driveway located perpendicular from Via De La Valle. The street segment that continues north of Via De La Valle from Jimmy Durante Boulevard is a paved roadway that would not be used during construction. Proper signage would be implemented near SDG&E's private driveway to alert drivers, cyclist, and pedestrians along Via De La Valle of ongoing construction activities at the nearby substation side. As detailed in the applicant's traffic control plan, SDG&E may use flaggers and implement other measures during peak traffic times to ensure safe ingress and egress of construction vehicles and equipment from-and-to Via De La Valle. Implementation of signage and other safety measures outlined in SDG&E's traffic control plan would avoid potential hazards associated with access to the Del Mar Substation and, as such, this impact would be less than significant.

Changes in Traffic Flow

Installation of temporary guard structures adjacent to Del Mar Heights, Jimmy Durante Boulevard, San Dieguito Drive, Racetrack View Drive, Via De La Valle, Carmel Valley Road, and Carmel Mountain Road could require temporary lane closures. The temporary lane closures could intermittently disrupt

normal traffic flow and increase traffic volume relative to normal operating capacity on affected roadway segments, which could potentially conflict with emergency vehicle access and circulation. In light of this, **APM TRA-01**, SDG&E would coordinate with the Del Mar Fire Department and the San Diego County Sheriff's Department to inform them of the planned lane closures along Jimmy Durante Boulevard at least 30 days prior to construction of the proposed project. Thus, SDG&E would make provisions to ensure that emergency vehicle access would be maintained at all times in coordination with both San Diego and Del Mar's fire, police and sheriff departments, such as allowing for bypass of slow vehicle traffic during lane closures.

In addition, SDG&E's traffic control plan may require notifying emergency service providers of the location, date, time, and duration of lane closures. The traffic control plan, as part of acquiring the necessary encroachment, traffic control, and access permits prior to construction, would facilitate alternative access route planning so that service providers would not be substantially or adversely affected by the traffic and congestion on primary access streets during construction. Although changes in traffic flow ~~would~~ and temporary and intermittent congestion along affected area streets would still occur, **APM TRA-01** and a SDG&E's traffic control plan would minimize potential disruptions to emergency vehicle access, circulation and response times during construction, resulting in a less than significant impact.

As noted above, operation and maintenance activities would be reduced as part of the proposed project associated with the removal of TL666D. The proposed project's underground facilities associated with the reconfiguration of TL674A would operate in the same manner as existing facilities and would not result in substantial increases in hazards in the project vicinity. Therefore, the proposed project would not result in an increase in hazards, and no impact would occur.

Significance: Less than Significant.

e. Would the project result in inadequate emergency access?

Construction of the proposed project would require stringing, conductor removal, and guard structure installation, trenching, and installing and removing poles adjacent to roadways. Lanes could be closed temporarily at Via De La Valle, Jimmy Durante Boulevard, Racetrack view drive, and San Dieguito Drive to reduce potential hazards to vehicle traffic during construction activities. SDG&E may use flaggers to temporarily hold traffic for brief periods, while the overhead line is installed at road crossings. Traffic control would typically be utilized for small roadway crossings.

I-5 is a county-designated evacuation route. The project route between Pole 105 and Pole 106 crosses over an I-5 overpass along Via De La Valle, where a new 69-kV underground power line would be installed. The new line would also be installed across two I-5 on-ramps and one I-5 off-ramp. Additionally, the proposed project would involve the removal of an existing 69-kV overhead power line, which currently crosses I-5, as part of the proposed TL666D removal.

Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all highway crossings. SDG&E would acquire encroachment permits and road crossing approvals, if required, and would implement the

requirements of these authorizations, including implementation of any special guard structure procedures, as directed by each authorizing agency.

A Del Mar Fire Department fire station is located on Jimmy Durante Boulevard at the Del Mar fairgrounds. Thus, the fire station is situated adjacent to the project's TL666D circuit, where the removal of a 69-kV line would potentially require a road closure or work along road shoulders that could temporarily and intermittently affect normal roadway operations. Consequently, a road closure on Jimmy Durante Boulevard could impair the fire department's ability to respond in a timely manner to an emergency, which could significantly impact emergency service response if provisions addressing construction-period contingencies were not implemented.

As discussed in **APM TRA-01**, SDG&E would coordinate with the Del Mar Fire Department and the San Diego County Sheriff's Department to ensure that both the police and fire departments are notified of planned lane closures along Jimmy Durante Boulevard at least 30 days prior to the commencement of construction of the proposed project. Therefore, SDG&E would make provisions to maintain emergency vehicle access at all times in coordination with the Cities of San Diego's and Del Mar's Fire Departments, the City of San Diego's Police Department, and the City of San Diego's Sheriff's Department, such as allowing for bypass of slow vehicle traffic during lane closures. SDG&E's traffic control plan would ensure that service providers would be able to account for the entirety of streets affected by temporary construction closures. In addition to planning alternative access routing and for other contingencies in advance of construction that could reduce potential conflicts arising from intermixing of construction traffic and reduced roadway capacity on Via De La Valle, Jimmy Durante Boulevard, Racetrack View Drive, and San Dieguito Drive. Although changes in traffic flow may still temporarily occur, APM TRA-01 and SDG&E's traffic control plan, as well as encroachment permit conditions set forth by applicable agencies (City of Del Mar, City of San Diego, and Caltrans), would minimize potential disruptions to emergency vehicle access to the extent feasible during construction.

Operation and maintenance of the proposed project would not necessitate lane or road closures. Once construction of the proposed project is complete, emergency access and vehicle circulation would function across the regional roadway network as it had prior to the temporary and intermittent construction period conditions near work areas. Thus, no impact would occur during operation and maintenance.

Significance: Less than Significant.

f. Would the project conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or an otherwise decrease in the performance or safety of such facilities?

Construction activities would occur on roads that are used for public transit, bicycle travel, and pedestrian travel. Construction would result in temporary disruptions to bicycle and pedestrian circulation along Via De La Valle, Carmel Valley Road, Sorrento Valley Road, and Sorrento Valley Pedestrian/Multi-Use Path. A temporary closure of the bicycle lane and sidewalk along portions of Via De La Valle would result from construction activities associated with the TL674A Reconfiguration. However, bicycle and

pedestrian access along one side of the street would remain open during construction activities, to the extent feasible.

Additionally, SDG&E would coordinate with the City of San Diego regarding designing and implementing temporary bicycle and pedestrian detours away from construction for the streets within the city. Removal of TL666D may temporarily disrupt pedestrian and bicycle access; however, the use of flaggers, signage, and/or other traffic control measures under SDG&E's traffic control plan would be implemented to facilitate the flow of traffic. Impacts to bicycle and pedestrian traffic would be less than significant since access along Via De La Valle, Carmel Valley Road, and Sorrento Valley Road would largely be maintained during construction of the proposed project.

The Sorrento Valley pedestrian/Multi Use Path may be closed for up to two months during the C738 Conversion. However, per **APM REC-1** (see Section 5.15, "Recreation"), SDG&E would post signage at Sorrento Valley/Multi-Use Path access points at least four weeks prior to construction activities. Signage would notify users of the impending construction activities, construction impacts (e.g., increased noise and dust), the affected locations, and the estimated duration of necessary temporary access restrictions. Due to short-term duration of closures and adequate alternative bicycle and pedestrian routes in the vicinity, impacts would be less than significant.

The reconfiguration of TL674A would also temporarily disrupt bus travel along Via De La Valle intermittently for approximately 3.5 months over the course of the approximate 12 months of construction. The Via De La Valle and Flower Hill bus stop on route 308 would likely be affected during construction of the proposed project. Further, implementation of **APM TRA-02** would minimize potential impacts to bus ridership. Per **APM TRA-02**, at least 30 days prior to construction, SDG&E would coordinate construction activities, including the timing and duration of construction near existing bus stops along Via De La Valle with the North County Transit District. Coordination would allow for identification of potential temporary relocation of the Flower Hill bus stop on route 308 during construction of the TL674A, if necessary. Further, at least 10 days prior to the bus stop closure, SDG&E will post signs near any affected bus stops to notify bus riders of any potential modifications the standard bus schedule, alternate stops in the area, and a phone number to call to obtain more information. **APM TRA-02** would ensure that adequate levels of transit service would be maintained; thus, impacts would be less than significant.

Operation and maintenance of the proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, nor would it decrease the performance or safety of such facilities. Existing transit routes and bus stops, bike lanes, and pedestrian access would return to their existing conditions prior to implementation of the proposed project. Thus, no impact would occur.

Significance: Less than Significant.

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5.17 Tribal Cultural Resources

This section describes the environmental and regulatory setting and discusses impacts associated with the construction and operation of the proposed project with respect to tribal cultural resources. Appendix H includes CPUC correspondence with the Native American Heritage Commission (NAHC) and Native American tribes within the vicinity of the proposed project alignment. Section 5.5, “Cultural Resources” provides a discussion of historical resources, unique archaeological resources, and paleontological resources.

Information presented in this section was compiled from the following sources:

- *Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project.* ~~(AECOM, 2017)~~ (Foglia, Cooley, and Mello 2017);
- SDG&E’s Proponent’s Environmental Assessment (SDG&E 2017) and subsequent submittals for the proposed project; and
- The results of the CPUC’s consultation with California Native American tribes pursuant to Assembly Bill (AB) 52 regulations.

The CPUC’s qualified consultant reviewed these documents, other submitted information, and the results of CPUC’s AB 52 consultation with California Native American tribes for the proposed project in preparing this analysis.

5.17.1 Environmental Setting

Ethnographic Cultural Setting

As noted in the Cultural Resources Technical Report (CTR) (Appendix D), the proposed project would be situated within the traditional territory of the prehistoric Yuman people (Foglia, Cooley, and Mello 2017). The Yuman people were described by the Spaniards as the Diegueño, which is a term that originates from the Mission San Diego de Alcalá and was adopted by early anthropologists; researchers today have designated the Kumeyaay living north of the San Diego River as ‘Iipai’ (Northern Diegueño), and those living south of the river and into Baja California as Tipai (Southern Diegueño). “Kumeyaay,” which is a Yuman term, also describes the people who were present at the time of European contact (Foglia, Cooley, and Mello 2017).

The Kumeyaay territory was bordered by the San Luis Rey River to the north, Baja California to the south, the Pacific Ocean to the west, and the Imperial Valley to the east. The southern boundary between the territories of the Shoshonean Luiseño/Juaneño and the Northern Diegueño, or ‘Iipai Kumeyaay, extended from the coast eastward along Agua Hedionda Creek to the northern tip of the valley between the San José and Palomar mountains (Foglia, Cooley, and Mello 2017). These areas are located in portions of modern-day San Diego County and include areas within the vicinity of the proposed project.

Tribal Cultural Resources

Tribal cultural resources (TCRs) are sites, features, places, cultural landscapes, sacred places, or objects that are of cultural value to a California Native American Tribe. They are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register. They also can be resources that the lead agency, at its discretion, chooses to treat as a TCR (Public Resource code [PRC] section 21074).

Additionally, a cultural landscape is a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape (PRC section 21074(b)). Additionally, TCRs may be historical resources (PRC section 21084.1), unique archaeological resources (PRC section 21083.2(g)), or non-unique archaeological resources (PRC sections 21083.2 (h) and 21084(c)).

California Native American Heritage Commission Consultation

The California Public Utilities Commission (CPUC) requested a search of the Sacred Lands Inventory and a Tribal Consultation List from the Native American Heritage Commission (NAHC) on January 16, 2018. The NAHC provided a response on January 17, 2018. The response indicated that no results were found in the Sacred Lands File. However, the information also indicates that this does not preclude the presence of Native American cultural resources. Twenty tribes in the San Diego region were noted as potentially having an interest in the proposed project. The tribes noted within the NAHC response are shown as being associated with the Kumeyaay (Appendix H).

AB 52 Tribal Consultation

The CPUC previously has received notifications from three California Native American tribes for projects located within San Diego County and for all CPUC projects. In response to these notifications, the CPUC mailed letters (via certified mail) and provided duplicate materials via email to the following three tribes on January 16, 2018: the San Luis Rey Band of Mission Indians (Luiseño), the Pala Band of Mission Indians (Luiseño), and the Sycuan Band of the Kumeyaay Nation. A response was received from the Pala Band of Mission Indians on January 18, 2018, indicating that the proposed project was not located in their traditional use area. A fourth letter was mailed on January 18, 2018, in response to a request from the Santa Ysabel Band of the Iipay Nation (Kumeyaay) to be notified of CPUC projects and dated January 9, 2018. The request noted that information should be provided for all projects located in San Diego County (among others). A response was received from the Santa Ysabel Band of the Iipay Nation on February 2, 2018 requesting additional consultation. The CPUC responded on February 15, 2018 noting their availability for a conference call (Appendix H).

5.17.2 Regulatory Setting

Federal

No federal regulations related to TCRs are applicable to the proposed project.

State

Assembly Bill 52

Assembly Bill (AB) 52 amends CEQA by creating a new category of cultural resources, tribal cultural resources, and new requirements for consultation with Native American tribes. AB 52 specifies that a

project that may cause a substantial adverse change to a tribal cultural resource is a project that may have a significant effect on the environment. The bill defines “tribal cultural resources” as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and that are either listed in the CRHR or eligible for inclusion in the CRHR. A lead agency, at its discretion and supported by substantial evidence, may choose to treat a resource as a tribal cultural resource. AB 52 requires early notice and consultation with California Native American tribes on the NAHC list, if requested by a tribe. Lead agencies will be required to offer Native American tribes the opportunity to consult on CEQA documents if the tribes have an interest in tribal cultural resources located within their jurisdiction. The new procedures under AB 52 offer the tribes an opportunity to take an active role in the CEQA process to protect tribal cultural resources. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult the tribe. AB 52 went into effect on July 1, 2015. In November 2015, the Governor’s Office of Planning and Research (OPR) requested public input on the draft CEQA guidelines that were revised to include tribal cultural resources. The OPR approved revised CEQA Guidelines incorporating AB 52 requirements on September 27, 2016.

AB 52 was codified in Sections 5097.94, 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 of the PRC. The provisions under these sections govern the consultation procedures with Native American tribes with respect to tribal cultural resources and the inclusion of mitigation or avoidance measures in environmental documents. The provisions under these sections also address the exchange of confidential information obtained from a California Native American tribe and define what a California Native American tribe means in the context of the consultation process.

Additional State Laws Regarding Archaeological and Native American Cultural Resources.

California law extends additional protections to Native American cultural resources (not limited to TCRs):

- PRC sections 5097.91 through 5097.991 pertain to the establishment and authority of the NAHC. These sections also prohibit the acquisition or possession of Native American artifacts or human remains taken from a Native American grave or cairn, except in accordance with an agreement reached with the NAHC, and provide for Native American remains and associated grave artifacts to be repatriated.
- PRC subsections 5097.98(b) and (e) require a landowner on whose property Native American human remains are found to limit further development activity in the vicinity until conferring with the most likely descendants (as identified by the NAHC) to consider treatment options.
- Health and Safety Code sections 7050 through 7054 make the disturbance and removal of human remains felony offenses because of the importance of human remains to the Native American community.
- PRC section 65092 provides for the notification of California Native American tribes who are on the contact list maintained by the NAHC about construction projects.
- PRC sections 5097.993 through 5097.994 make it a misdemeanor crime to perform unlawful and malicious excavation, removal, or destruction of Native American archaeological or historical sites on public or private lands.

- Penal Code section 622 establishes as a misdemeanor the willful injury, disfiguration, defacement, or destruction of any object or thing of archaeological or historical interest or value, whether situated on private or public lands.
- PRC section 6254(r) protects Native American graves, cemeteries, and sacred places maintained by the NAHC by protecting records of such resources from public disclosure under the California Public Records Act.

Local

No local regulations related to TCRs are applicable to the proposed project.

5.17.3 Environmental Impacts and Assessment

The impact analysis below identifies and describes the proposed project's potential impacts on TCRs within the project area. Potential impacts were evaluated according to the significance criteria presented in Appendix G of the California Environmental Quality Act (CEQA) Guidelines and listed at the start of each impact analysis section below.

Applicant Proposed Measures

The applicant has not incorporated APMs to specifically minimize or avoid impacts on TCRs.

Significance Criteria

Table 5.17-1 includes the significance criteria from Appendix G of the CEQA Guidelines' tribal cultural resources section to evaluate the environmental impacts of the proposed project.

Table 5.17-1 Tribal Cultural Resources Checklist

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No tribal cultural resources were identified in the project study area to date. In the event that a tribal cultural resource were discovered in the project area, and the archaeological monitor or qualified Native American monitor determines that it is listed or eligible for listing in the CRHR, the resource would either be avoided, preserved in place, or handled as determined during tribal consultation. However, because no tribal cultural resources were identified in the project study area, none are listed or eligible for listing in the CRHR. Therefore, no impact will result.

Significance: No Impact.

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 Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Based on the findings presented in Appendix D and the responses received to date from Native American representatives, no tribal cultural resources were identified in the project study area. As described in Appendix D, the applicant sent letters to 19 Native American representatives that may be knowledgeable about cultural resources within or near the project area. Copies of the applicant's letters are included in Appendix D. Responses received by the applicant to date include correspondence from the Inaja Band of Mission Indians, the Campo Band of Mission Indians, the Mesa Grande Band of Mission Indians, and the Kwaaymii Laguna Band of Mission Indians. With the exception of the response from Carmen Lucas of the Kwaaymii Laguna Band of Mission Indians, the responses received to date specified no issues or concerns with the proposed project. In a voice message dated October 21, 2016, Carmen Lucas stated that the project area is rich with cultural resources and that an archaeological monitor and qualified Native American monitor should be present during construction. The applicant has not established additional contact with the 15 remaining Native American representatives.

As previously noted, the CPUC has received two responses to date, one from the Pala Band of Mission Indians, indicating that the proposed project was not located in their traditional use area, and one from the Santa Ysabel Band of the Iipay Nation, requesting further consultation. No information regarding TCRs has been received to date (Appendix H).

Tribal consultation would continue throughout all phases of the proposed project, as deemed necessary. If any tribal cultural resources are identified in the project area, they would be either avoided, preserved in place, or handled as determined during consultation. As a result, any potential impacts would be less than significant.

Significance: Less than significant.

References

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5.18 Utilities and Service Systems

5.18.1 Environmental Setting

Water

The San Diego County Water Authority (SDCWA) provides potable water service to the cities of San Diego and Del Mar through purchase agreements. In turn, the SDCWA purchases the majority of its water from the Metropolitan Water District of Southern California. Approximately 70 percent of the SDCWA's water is imported from the Colorado River, 17 percent is imported from the California State Water Project, and the remaining 13 percent comes from local sources (SDCWA 2016a).

The city of San Diego has nine local surface water reservoirs, with a combined capacity of 569,021 acre-feet. Seven of these reservoirs provide continuous local water supply, but two are intended for emergency use only. These reservoirs capture runoff from rainfall within local watersheds and are connected to the regional imported water system.

The city of San Diego also produces a small amount of groundwater from several basins in the region. Currently, the city's Public Utilities Department produces approximately 500 acre-feet of groundwater (less than 1 percent of the city's total water supply) from the Santee/El Monte Basin.

San Diego has three water treatment plants that provide potable drinking water: Alvarado, Miramar, and Otay. These water treatment plants provide a combined capacity of 378 million gallons per day. The city's water system extends over 404 square miles and delivers approximately 200 million gallons per day (equivalent to 224,000 acre-feet per year) (City of San Diego 2015a).

The City of San Diego's Urban Water Management Plan includes a summary of historical and projected water usage within the service area by sector: single-family residential, multi-family residential, commercial/institutional/industrial, irrigation for large landscaped areas, and other (which includes dust suppression and cleaning). In 2015, potable water use within the city of San Diego was 167,112 acre-feet. Potable water demand is projected to increase to 230,980 acre-feet in 2040 (not including wholesale water sales). Between 2010 and 2015, total retail water demands decreased by 6 percent, while the use of recycled water during the same period increased by 3 percent. Demands from the single-family residential sector represents the highest demand by sector at 36 percent (City of San Diego 2015a).

The SDCWA Urban Water Management Plan estimates that the city of Del Mar's normal year water demand is 96 acre-feet (2015) and is estimated to increase to 1,040 acre-feet in 2040 (SDCWA 2016b). California droughts, mandatory water use restrictions, and public education have decreased water demand; however, residential water demand will continue to increase over the next several decades, based on San Diego Association of Governments growth estimates.

Wastewater

The Metropolitan Wastewater System provides sewer services to the cities of San Diego and Del Mar (and 14 other cities and districts). The Metro Wastewater Joint Powers Authority is a coalition of municipalities and special districts that share in the use of the city of San Diego's regional wastewater

facilities, which include three wastewater treatment plants: North City Water Reclamation Plant, South Bay Reclamation Plant, and Point Loma Wastewater Treatment Plant. Total measured wastewater collected from the wastewater service area was 190,313 acre-feet per year in 2015. Most of the treated wastewater is discharged, in compliance with federal and state laws, to the Pacific Ocean via a 4.5-mile outfall pipe. Some of the wastewater flows are diverted to reclamation plants for recycling and distribution. The City of San Diego collects, treats, and disposes of nearly 180 million gallons of wastewater each day over the 450 square miles service area, which includes the city of Del Mar (City of San Diego 2015a).

Stormwater

The City of San Diego's stormwater infrastructure is not combined with the city's sewer system. Instead, stormwater within the cities of San Diego and Del Mar is conveyed through a system of pipes and channels that lead to a network of creeks, streams, and rivers, where untreated stormwater eventually is discharged into the ocean. In an effort to reduce coastal pollution, the City of San Diego has installed a network of stormwater interceptor stations that catch dry weather runoff from watered lawns, outdoor washing, or construction sites and then route some of this water through the sewer system (City of San Diego 2015a).

Solid Waste

The City of San Diego sends non-recyclable solid waste to the Miramar Landfill, which the city owns and operates. Table 5.18-1 summarizes landfills near the project area.

Table 5.18-1 San Diego Landfills in the Project Vicinity

Landfill	Location	WDR Class	Max. Permitted Disposal ^(a)	Permitted Capacity ^(b) / Scheduled Closure Date	Remaining Capacity ^(b)	Waste Type
Miramar Landfill	5180 Convoy Street, San Diego	III	8,000	87,760,000/ August 31, 2025	15,527,878 ^(c)	Construction/ demolition, mixed municipal, tires
Otay Landfill	1700 Maxwell Road, Chula Vista	III	6,700	61,154,000/ February 28, 2030	21,194,008 ^(d)	Agricultural, ash, construction/demolition, contaminated soil, tires, mixed municipal, etc.
Sycamore Landfill	8514 Mast Boulevard, San Diego	III	5,000	147,908,000/ December 31, 2042	113,972,637 ^(e)	Asbestos, contaminated soil, mixed municipal, biosolids, agricultural waste, etc.

Sources: CalRecycle 2017a, 2017b, 2017c

Notes:

^(a) in tons/day

^(b) in cubic yards

^(c) assessed in 2016

^(d) assessed in 2014

^(e) assessed in 2014

Key:

N/A = not applicable

WDR = Waste Discharge Requirement

Hazardous materials are not accepted at the Miramar Landfill, including hazardous waste, infectious waste, liquid waste, radioactive waste, etc. The landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous.

Cable and Telephone

Within the cities of San Diego and Del Mar, Cox Communications serves the community south of the San Diego River for cable, broadband, and phone services, and Time Warner Cable serves areas north of the San Diego River. AT&T also provides telephone and internet services to residents.

Electricity and Natural Gas

San Diego Gas & Electric Company (SDG&E) provides electricity and natural gas to San Diego and Southern Orange Counties. The SDG&E service territory includes 4,100 square miles and serves as many as 3.6 million people. Within the project vicinity, electrical transmission and distribution lines are located along Via De La Valle, on the east side of Interstate 5 within the Torrey Hills Community Plan Area, and on the west side of Interstate 5.

5.18.2 Regulatory Setting

Federal

There are no applicable federal regulations associated with utilities.

State

The regulations presented below are mostly related to solid waste disposal and siting of electrical utilities. Regulations concerning water supply and demand are not applicable to the proposed project because it would not result in demand for new water resources not already accounted for in existing water entitlements or growth projections, necessitate new or expanded stormwater infrastructure, exceed wastewater treatment requirements, or require new or expanded wastewater treatment facilities to accommodate project demands. The policies and regulations below focus on electrical utility infrastructure.

Integrated Waste Management Act of 1989

The Integrated Waste Management Act of 1989 (IWMA, Assembly Bill [AB] 939, Sher, Chapter 1095, Statutes of 1989 as amended) requires cities and counties to reduce, by 50 percent, the amount of solid waste disposed of in landfills by the year 2000 and beyond. The City of San Diego complies with the state mandate for integrated waste management practices by maximizing waste reduction and diversion efforts. Additionally, the City of San Diego continues to take an active role in educating the public about the economic and environmental benefits of waste reduction. The City of San Diego reached a 52 percent diversion rate in 2004 and has steadily increased diversion to 68 percent in 2012 (City of San Diego 2018). The City of Del Mar also met the 50 percent diversion rate requirement (San Diego County 2005). Senate Bill (SB) 1016 builds on AB 939 by implementing simplified measures of performance toward meeting solid waste goals. SB 1016 does not change AB 939's 50 percent requirement, but it does change the target diversion goal to be on a per capita basis.

Assembly Bill 341

The IWMA requires all county and local governments to adopt a Source Reduction and Recycling Element to identify ways to reduce the amount of solid waste sent to landfills. This law set reduction targets of 25 percent by 1995 and 50 percent by the year 2000. AB 341, signed into law in 2011, established a new statewide target of 75 percent disposal reduction by the year 2020.

AB 341 requires the California Department of Resources Recycling and Recovery to develop and adopt regulations for mandatory commercial recycling, which was not required under the previous version of the IWMA. Since July 1, 2012, businesses are required to recycle. The IWMA, as amended by AB 341, requires that businesses implement a commercial recycling program (CalRecycle 2017d).

Local

The proposed project would not be subject to local discretionary regulations because as a state agency, the California Public Utilities Commission has jurisdiction over the construction and operation of the proposed project (see Section 5.10, "Land Use and Planning"). However, the following local regulations and policies regarding utilities and services are considered with regard to the proposed project for informational purposes:

San Diego County Integrated Waste Management Plan

An element of the IWMA is the preparation of the Countywide Integrated Waste Management Plan (CIWMP). The San Diego County CIWMP consists of a Countywide Siting Element, Countywide Summary Plan, and three elements for each jurisdiction: 1) Source Reduction and Recycling Element, 2) Household Hazardous Waste Element, and 3) Non-Disposal Facility Element. The CIWMP includes goals and policies to ensure an effective and economical integrated waste strategy within the county (San Diego County 2005).

City of Del Mar Community Plan

The City of Del Mar Community Plan provides the following policy that is relevant to the proposed project (City of Del Mar 1976):

Community Development: Objective F. Protect and enhance human scale, warmth, charm, interest, texture, pedestrian involvement and landscaping. 4. Initiate a continuous program of replacing overhead utility distribution equipment with an underground system.

City of San Diego General Plan

The City of San Diego General Plan includes policies to provide sufficient public utilities and services to meet existing and future demands. The General Plan also notes that maintenance practices associated with public infrastructure should be sensible, efficient, and well-integrated into the natural and urban landscape. In 2002, the city formally adopted a policy for the undergrounding of overhead utility lines to protect public health, safety, and general welfare (City of San Diego 2015b). The following policies address utilities within the vicinity of the proposed project:

PF-M.1. Ensure that public utilities are provided, maintained, and operated in a cost-effective manner that protects residents and enhances the environment.

PF-M.4. Cooperatively plan for and design new or expanded public utilities and associated facilities (e.g., telecommunications infrastructure, planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities) to maximize environmental and community benefits.

Torrey Hills Community Plan

SDG&E owns an approximately 40-acre parcel within the Torrey Hills Community Plan area that accommodates a 230-kilovolt (kV) substation. Additionally, area covered by the Torrey Hills Community Plan contains both overhead and underground utility lines (City of San Diego 2014a). The following policies consider utilities and the area in which the proposed project would be located:

Community Facilities Policy 2: Ensure that adequate utility services and infrastructure are expanded and phased in accordance with community development.

Community Facilities Policy 8: Minimize potential impacts to Peñasquitos Lagoon by providing drainage facilities to control runoff, erosion, and sedimentation.

Community Facilities Policy 9: Encourage the design of utility facilities which are aesthetically and environmentally sensitive. This includes, to the degree financially feasible, locating utility lines of 69 kV and below, underground, and screening large, concrete-lined drainage channels and the SDG&E substation facilities.

Torrey Pines Community Plan

The Del Mar substation and five overhead 69 kV power lines are located within the Torrey Pines Community Plan area (City of San Diego 2014b). The following policies address utilities and the area in which the proposed project would be located:

Resource Management & Open Space Element – Los Peñasquitos Policy 1: Development of new public facility and utility projects that traverse or impact Los Peñasquitos Lagoon should either be rerouted out of the lagoon, or be designed to minimize or eliminate impacts to the lagoon. Mitigation for these projects should include restoration and enhancement to the lagoon.

Resource Management & Open Space Element – Los Peñasquitos Policy 5: Plans for future removal or rerouting of the electrical utility lines that transect Los Peñasquitos Lagoon shall be given high priority.

Community Facilities Policy 4: Where feasible, remove or relocate public utility or facility projects from Los Peñasquitos Lagoon when improvements to these utilities are proposed.

Community Facilities Policy 5: When feasible, underground all above ground utility lines when major street improvements are proposed.

Via De La Valle Specific Plan

The Via De La Valle Specific Plan area is divided by a 150-foot power easement, which contains one 230-kV, one 138-kV, and two 69-kV overhead transmission lines. In addition, oil and natural gas lines are located within the project area, as well (City of San Diego 1984). The following policies consider utilities and the area in which the proposed project would be located:

Public Services Element Goal 4: Require the use of underground utilities and underground cable communications, in accordance with City ordinances.

Coastal Element Compatible Land Use 5: Utilities shall be placed underground.

5.18.3 Environmental Impacts and Assessment

Applicant-Proposed Measures

The applicant has not incorporated applicant-proposed measures into the proposed project to specifically minimize or avoid impacts on public utilities and service systems.

Significance Criteria

Table 5.18-2 includes the significance criteria from Appendix G of the California Environmental Quality Act Guidelines' utilities and services section to evaluate the environmental impacts of the proposed project.

Table 5.18-2 Utilities and Service Systems Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

As described in Chapter 4.0, "Project Description," construction would occur over a period of 12 months and employ up to 125 construction personnel. During construction, portable toilets would be provided for onsite use and would be maintained by a licensed sanitation contractor. They would be used in accordance with applicable sanitation regulations established by the Occupational Safety and Health Administration. The licensed contractor would dispose of the waste at an offsite location and in compliance with standards established by the Regional Water Quality Control Board (RWQCB).

Construction of the proposed project may encounter potential groundwater during trenching activities, and dewatering may be necessary. The trench water that would need to be dewatered in accordance with RWQCB National Pollutant Discharge Elimination System requirements and standards. As described in Section 5.9, "Hydrology and Water Quality," SDG&E would obtain a stormwater discharge General Permit for disturbance to soil. In the event that trenching activities encounter water, the applicant shall adhere to all relevant requirements, including development of a Stormwater Pollution Prevention Plan that would address desiltation and/or other filtration methods to be implemented until water outflow meets applicable permit requirements. Upon confirmation that the dewatered source meets appropriate standards, it would be discharged to land or surface waters, where it would percolate back into the groundwater system (SDG&E 2017a). As a result, project construction activities would not generate wastewater with potential to exceed wastewater treatment requirements; the impact would be less than significant.

The proposed project would remove and reconfigure existing electrical distribution infrastructure, which would continue to be maintained by SDG&E upon completion of the proposed reconfiguration. The proposed project would not increase the intensity of existing land uses such that new or expanded sanitation facilities or sewer lines would be required as a result. Therefore, the proposed project would not generate or release wastewater that would exceed RWQCB treatment requirements, and as such, there would be no impact.

Significance: Less than Significant

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?

As previously noted, portable toilets would be provided during the 12-month construction period for use by the construction personnel. Accordingly, construction activities would generate a minimal amount of wastewater that would be transported to a location with adequate treatment capacity, which would avoid the need for a sewer connection to municipal services.

As described in Section 5.13, "Population and Housing," SDG&E anticipates that construction personnel would reside in the local area; therefore, the proposed project would not cause indirect demand for temporary housing and associated water and wastewater infrastructure. In addition, as described in Section 5.4, "Air Quality," water would be applied to non-paved portions of the construction areas as needed to control fugitive dust. Such water would be carried in on trucks and would either evaporate or be

absorbed into the ground. Water for dust-suppression use is discussed in Section 5.9, "Hydrology and Water Quality." For these reasons, the proposed project would not result in the need to construct new water or wastewater treatment conveyance or facilities. However, during project construction, the use of portable toilets would temporarily generate a minimal amount of wastewater that would be transported to existing treatment facilities, and the Therefore, project-related impacts to wastewater treatment facilities would be less than significant.

Significance: Less than Significant

c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The proposed project would remove and reconfigure existing power and distribution line infrastructure. As described under criterion (a) of the checklist, trenching activities associated with underground duct bank construction could potentially encounter water, which would require dewatering for its removal. Any dewatering that would occur via pumping would be subject to RWQCB National Pollutant Discharge Elimination System requirements and standards. Following testing and compliance with the applicable permit requirements, the applicant would dispose of dewatered wastewater at the Miramar Water Treatment Plant or, if approved by RWQCB, would discharge this water onsite into the stormwater drainage system. No change to stormwater drainage facilities would occur. Construction-related discharges into the stormwater system would be temporary and therefore, impacts related to new or expanded stormwater drainage facilities would be less than significant.

The proposed project would involve removal and reconfiguration of existing electrical distribution infrastructure. The project would remove infrastructure from service on TL666D, new infrastructure such as poles, vaults, etc., would be installed. Impervious surfaces associated with all existing project infrastructure accounts for a total of approximately 0.00995 acres (433 square feet). With implementation of the proposed project, impervious surface coverage would increase 3 percent (net addition of 0.00034 acres) for a total of 0.01029 acres (or 448 square feet).

Proposed duct banks would be installed below grade within existing SDG&E right-of-way or city streets. The pre-construction surface would be replaced as part of the restoration process in these locations; therefore, the pre- and post-construction conditions would match and would not increase impervious surfaces. The 12 kV hand holes would be installed entirely within existing pavement, as well. An increase in 0.00034 acres of impervious surfaces is considered negligible and would not substantially alter surface water runoff necessitating construction of new or expanded stormwater drainage facilities. The project components would not increase land use intensities to require the installation of stormwater drainage facilities, and ~~the impact would be less than significant~~ there would be no impacts to existing stormwater drainage facilities, nor would there be a need to construct new stormwater drainage facilities.

Significance: ~~Less than Significant~~ No Impact

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction of the proposed project would require water to suppress fugitive dust on non-paved portions of roads and access ways throughout the project alignment, as outlined in Section 5.3, “Air Quality.” SDG&E conservatively estimates that between 584,000 and 700,000 gallons of water (or about 2 acre-feet) would be required for this effort. Therefore, the proposed project would require use of existing water supplies from municipal services to accommodate construction. (SDG&E 2018b)

The City of San Diego Urban Water Management Plan includes a summary of historical and projected water usage within the service area by sector, including an allotment of water supply used for “other” purposes such as temporary dust mitigation and cleaning. The Urban Water Management Plan indicates that the use of potable water for dust mitigation is prohibited during a Drought Response 1 through 4, as designated by the San Diego County Water Authority.¹ Use of recycled or non-potable water, when available, is required for construction purposes because it helps to reduce demand for potable water (SDCWA 2016c). The use of recycled water increased by 3 percent between 2010 and 2015, owing to climatic and drought conditions within the region. The City of San Diego further projects to expand recycled water use to 13,650 acre-feet per year by 2020 (City of San Diego 2015a).

Use of water for project dust control mitigation would be temporary and limited to the 12-month construction period. While the proposed project would draw on existing supplies, sufficient water supply would be available to meet water demands for construction needs (see Section 4.9, “Hydrology and Water Quality”). Project maintenance and operation activities would not affect demand for municipal water services, resulting in the need for increased water supplies. Therefore, no significant water supply impacts associated with project operations are anticipated.

Significance: Less than Significant

e. 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?

As previously described under criteria (a) and (b), during the construction period, portable toilets would be provided for on-site use and would be maintained by a licensed sanitation contractor. In addition, trenching activities associated with underground duct bank construction could potentially require dewatering activities where some of the water would be disposed of at the Miramar Water Treatment Plant. Construction-related wastewater would be temporary and would not generate wastewater that would require the need for additional wastewater treatment capacity. The impact would be less than significant.

The proposed project would remove and reconfigure existing power and distribution line infrastructure. It would continue to be maintained by SDG&E personnel. The proposed project would not introduce any components or land uses that would require the need for connection to municipal wastewater services. As

¹ Use of recycled water for construction purposes is voluntary during drought response level 1; mandatory during drought response level 2 through 4 (SDCWA 2016c).

a result, the proposed project would not affect wastewater treatment provider capacity and there would be no impact.

Significance: Less than Significant

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

As described in Chapter 4.0, "Project Description," the proposed project would remove multiple power lines, poles, and associated infrastructure from service. Approximately 34 existing poles would be removed from service, and an additional 51 poles would be topped. These poles, pole sections, and associated hardware would be disposed of at an approved landfill. In addition, approximately 7,600 cubic yards of spoils would be disposed of at an approved landfill. Some additional solid waste may be generated from packaging material and other forms of debris generated as part of typical construction activities. Solid waste within the proposed project area would be taken to the Miramar Landfill, Sycamore Landfill, or the Otay Landfill.

The Miramar Landfill is estimated to have 15,527,878 cubic yards of capacity and can therefore accommodate construction waste from the proposed project. This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the City of San Diego's Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. Should the material be considered hazardous, SDG&E will dispose of it at another site, consistent with applicable laws/regulations. The impact would be less than significant.

Solid waste generated during project operation and maintenance would include replaced parts and equipment, vegetation materials cleared during routine maintenance and minimal domestic trash (e.g., glass, paper, plastic, packing materials, etc.) from crew, which would be removed and taken off site for disposal. These are the same types of wastes that currently are generated by operation and maintenance activities. The proposed project features would not introduce any components or land uses that would produce solid waste. No impact would occur.

Significance: Less than Significant

g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

The proposed project would generate a negligible amount of solid waste during construction, of which materials would be recycled whenever practicable. As described under criterion (f), solid waste from construction would be taken to the Miramar Landfill, Sycamore Landfill, or Otay Landfill. Management and disposal of solid waste would comply with all applicable federal, state, and local statutes and regulations; therefore, no impact would occur.

Solid waste generated during project operation and maintenance would include replaced parts and equipment, vegetation materials cleared during routine maintenance, and minimal domestic trash (e.g., glass, paper, plastic, packing materials, etc.) from maintenance workers, which would be removed and taken offsite for disposal. These are the same types of wastes that currently are generated by operation

1 and maintenance. The proposed project features would not introduce any components or land uses that
2 would produce solid waste that would conflict with federal, state, or local standards. No impact would
3 occur.

4
5 **Significance: No Impact**

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5.19 Mandatory Findings of Significance

5.19.1 Cumulative Impacts

This section discusses mandatory findings of significance, as well as potential cumulative and growth-inducing impacts related to the TL674A Reconfiguration and TL666D Removal Project. CEQA Guidelines Section 15065 requires lead agencies to make certain mandatory findings in determining whether a proposed project would result in significant impacts on the environment. The criteria for making these findings are presented in Table 5.19-2.

Defining Cumulative Impacts

CEQA Guidelines Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” All environmental topics included in this Initial Study (reflected in Sections 5.1 Aesthetics through 5.17 Utilities and Service Systems) are evaluated to determine whether the project would have the potential to cause cumulative effects. In making such a determination, CEQA directs lead agencies to consider first whether “the cumulative impact is significant” and then whether “the project’s incremental effect, though individually limited, [would be] ‘cumulatively considerable.’” (Guidelines Section 15064(h)(1)) The Guidelines note that other reasonably foreseeable projects alone “shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.”

Timeframe of Cumulative Analysis

The timeframe of the cumulative analysis relates to when and for how long potential cumulative impacts may occur. Project impacts may be classified as causing short- or long-term environmental effects. Short-term effects would be those that may potentially occur during construction work associated with reconfiguring TL647A, removing TL666D from service, ~~and~~ converting portions of existing overhead 12 kV distribution to underground configuration, and removing and replacing the circuit breaker at the Del Mar Substation. SDG&E anticipates project construction commencing in 2019, extending over an approximately 12-month period, with completion estimated in 2020. Construction could occur up to six days per week, Monday through Saturday during normal work hours, pending jurisdictional requirements.

Long-term impacts would be those associated with operation and maintenance of the local electrical distribution grid and would potentially occur after project construction is complete. SDG&E anticipates that removing 6 miles of overhead TL666D line currently exposed to the elements would in the future avoid the need to access the environmentally sensitive San Dieguito and Peñasquitos Lagoons for repair work. In the main and taken together, SDG&E anticipates the project would improve system reliability overall comparative to existing conditions and the proposed project’s long-term operational and maintenance effects would be of lesser frequency, magnitude and intensity than of those of the current (baseline) circuitry configuration.

This Initial Study finds no significant project-level long-term (O&M) impacts for any environmental topics. Moreover, there are also no known future projects that would generate similar impacts, with which the proposed project’s could combine. The proposed project’s long-term operational effects would neither

1 cause cumulative impacts nor represent considerable contributions to such effects. The evaluation of the
2 proposed project's cumulative impacts therefore involves evaluating short-term (construction) impacts in
3 combination with the possible impacts of reasonably foreseeable probable future projects, which is the
4 subject of the analysis in response to item 19 (b), below.

6 **Approach and Geographic Scope**

7 The CEQA Guidelines outline two methods to identify reasonably foreseeable projects for analyzing
8 cumulative effects, which are referred to as list and projections-based approaches. The list-based
9 approach consists of compiling a list of "past, present and probable future projects producing related or
10 cumulative impacts, including, if necessary, projects outside the control of the agency." (CEQA
11 Guidelines Section 15130(b)(1)(A)) The projections-based approach entails preparing a summary of
12 projections contained in an adopted local, regional or statewide plan, such as a General Plan, or related
13 planning document like regional forecasting and planning documents, that describes or evaluates
14 conditions contributing to the cumulative effect (CEQA Guidelines Section 15130(b)(1)(B)). Lead
15 agencies may use either— or a combination of both— approaches depending on what best suits the
16 topical evaluation.

17
18 Cumulative impacts would be the potential impacts from past, present and reasonably foreseeable projects
19 that could combine with similar impacts caused by the proposed project. As reported in Sections 5.1
20 through 5.18 of this Initial Study, potential project impacts would be those resulting from construction of
21 the various project components. Construction impacts would be temporary and highly localized, and
22 concentrated around work sites, laydown yards and places where project construction work would occur
23 or machinery would operate. With the exception of work anticipated at the Del Mar Substation,
24 ~~C~~onstruction work would advance along the corridors as crews would remove or add poles, excavate
25 trenches, install ducts and complete the work of undergrounding and reconfiguring the electrical lines.
26 The study area's size is spatially sufficient for identifying foreseeable projects and evaluating of
27 cumulative effects. Potential impacts would be localized and would be generated by construction
28 activities at points along the corridors where work would occur. Air quality and GHG emissions are by
29 their nature considered in a cumulative context given that gases, once emitted from a source into the
30 atmosphere, would eventually disperse well beyond any arbitrary boundaries designating a study area.

32 **Reasonably Foreseeable Future Projects**

33 Table 5.19-1 lists the foreseeable projects considered in conjunction with the proposed project in the
34 analysis of cumulative impacts. Information related to these projects is derived from the applicant's
35 Preliminary Environmental Assessment, map viewers and project information on web pages hosted by:

- 37 • City of San Diego Planning Department;
- 38 • City of Del Mar Planning and Community Development; and,
- 39 • California Department of Transportation.

Table 5.19-1 Reasonably Foreseeable Projects

	Project Description	Location	Distance	Status
I	Water Group 939 Replacement Project Replacement of water mains along Flinkote Ave., crossing Carmel Mountain Rd. and Sorrento Valley Rd.	Various City of San Diego	0.05	Construction underway, est. completion 2019.
	Via De La Valle Underground Utility District Installation of street lights within Via De La Valle as part of utilities undergrounding program.	Along Via De La Valle, City of San Diego	adjacent	Design phase, est. complete 2020.
	Water Main Capital Improvement Project Replacement of approx. 4,960 linear ft. of water mains in the Torrey Pines community planning area.	Sorrento Valley Rd., Industrial Ct., Tripp Ct., City of San Diego	0.06	Construction underway, est. completion 2018.
	Pipeline Rehabilitation AF1 Trenchless rehabilitation of approximately 7 miles of existing 8-in. deteriorated sewer mains within roadways between Del Mar Heights Rd. and Carmel Valley Rd.	Crosses various roadways, City of San Diego	0.24	Construction underway, est. completion 2018.
	El Camino Real Bridge/Road Widening Project Road modifications and bridge replacement along a segment of El Camino Real between Via De La Valle and San Dieguito Rd.	El Camino Real from Via De La Valle to San Dieguito Rd., City of San Diego	0.46	Approved est. 2019-2021
	New One Paseo Development of a neighborhood village in Del Mar Heights on a vacant, approx. 23.6-acre lot, including 608 housing units, 280,000 sq. ft. of office space, and 95,000 sq. ft. of commercial retail.	Southwest corner, Del Mar Heights Rd./ El Camino Real, City of Del Mar	0.50	Construction underway, est. completion 2019.
II	Los Peñasquitos Lagoon Bridge Replacement Part of LOSSAN rail corridor, replacement of four aging wooden trestle rail bridges in Los Peñasquitos Lagoon with modern concrete bridges.	Los Peñasquitos Lagoon, City of San Diego	adjacent	Construction complete, 2018.
	Del Mar City Hall/Town Hall Project Redevelopment of existing City Hall site with new civic buildings and amenities.	1050 Camino Del Mar, City of Del Mar	0.60	Construction complete, 2018.
	Sewer and Water Capital Improvement Project Open trench construction of approx. 5,175 linear ft. of sewer line, point repairs of existing sewer mains, trenchless rehab of 2,297 linear ft. of sewer main, construction of 205 linear ft. of 6-inch water main, and decommissioning of 7th Street pump station.	City of Del Mar	0.85	Construction complete, 2017.
	I-5/Genesee Avenue Interchange Project Replacement of existing 6-lane Genesee Avenue overpass with a 10-lane bridge.	Along I-5 from Sorrento Valley Rd. to Voigt Dr., City of San Diego	0.95	Construction complete, 2015.

Table 5.19-1 Reasonably Foreseeable Projects

	Project Description	Location	Distance	Status
III	Watermark Del Mar Multi-family residential development comprising 12 structures, 48 dwellings and parking structure with vehicular access from San Dieguito Rd.	Jimmy Durante Blvd., San Dieguito Rd., City of Del Mar	adjacent	Approved 2018, construction period N/A
	Saint John Garabed Project Construction of a 350-seat church, 500-seat multipurpose hall, education building, and gymnasium.	13925 El Camino Real, City of San Diego	0.65	Approved 2015 construction schedule unknown. Permits expire 2021.
	The Estates at Del Mar Subdivision Subdivision of property into 5 single-family residential lots west of Camino del Mar.	929 Border Ave., City of Del Mar	0.71	Approved; construction, schedule unknown.
	Del Mar Village Mixed-Use Project Specific plan to develop two parcels totaling 25,527 sq. ft. for a 19,650-sq. ft. multi-building mixed-use project with 38 office condos/work lofts, 3 retail condominiums, 2 restaurant sites and underground parking on 3 levels (approx. 106 spaces). Prior site uses included gas station and two-story commercial building.	941 Camino Real, City of Del Mar	0.9 mi from Torrey Pines Extension work area	Approved 2018, construction, schedule unknown.
IV	San Dieguito Track and Trestle Replacement Replacement of a 100-year-old wooden trestle across San Dieguito Lagoon and 1.1 miles of double track within the Los Angeles-San Diego-San Luis Obispo rail corridor (LOSSAN) in the cities of Solana Beach and Del Mar.	San Dieguito Lagoon, City of Del Mar	adjacent	Unfunded. Construction anticipated 2030?
	I-5 / SR-56 Interchange Project Roadway improvements on I-5 between Del Mar Heights Rd. and Carmel Valley Rd., and on SR-56 between I-5 and Carmel Country Rd.	I-5/SR-56 Intersection, City of San Diego	0.20	approved; unfunded est. completion 2025-2035

Sources: SDG&E 2017; City of San Diego, 2018, City of Del Mar 2018.

Notes:

I The six projects in group I are currently under construction or construction is imminent.

II The four projects in group II are those for which construction work has been completed.

III The four projects in group III are those that have been approved and the construction schedule is unknown.

IV The two projects in group IV are those that have been approved but are not funded and have an estimated completion date of 2025 or later.

As illustrated in Table 5.19-1, 16 reasonably foreseeable projects are identified within the project study area. Of these, six are currently under construction or construction as of late 2019 is imminent; four projects have recently been completed; another four projects have been approved but construction has not yet begun and construction schedule information is not available; and two projects have been approved but are not funded and have an estimated completion date of 2025 or later.

5.19.2 Environmental Impacts and Assessment

Table 5.19-2 includes the three questions from Appendix G of the CEQA Guidelines that relate to making mandatory findings of significance for the proposed project.

Table 5.19-2 Mandatory Findings of Significance Criteria

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Biological Resources

Overall, the proposed project would result in the installation of structures within existing roads in right-of-way that does not provide substantial habitat resources, and the removal of existing manmade structures from within multiple high-quality habitat areas, including San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Natural Reserve Extension as well as limited work at the Del Mar Substation site. With the exception of the substation, the aforementioned ~~these~~ areas contain substantial habitat resources including ESHAs and sensitive natural communities that may be identified as ESHAs, such as Torrey Pine Forest, Diegan Coastal Sage Scrub, various chaparral communities, and various marsh, riparian, and wetland communities (see Section 4, "Biological Resources," Tables 5.4-5 and 5.4-12). These sensitive natural communities, as well as other native natural communities within the project vicinity that are not sensitive, provide extensive habitat for special status plant and wildlife species.

Biologists observed 17 special status plant species (see Table 5.4-3) and 24 special status wildlife species (see Table 5.4-4) in preliminary project area surveys. Biologists also identified additional special status species that were not directly observed during project area surveys, but are highly likely to occur within the project vicinity based on habitat analyses and historic observations. Project-related impacts to any

1 special status species, including impacts to sensitive and non-sensitive natural communities that provide
2 habitat resources for such species, would be significant. Because many project-related activities would be
3 occurring both adjacent to and within locations identified as Important Bird Areas of Global Priority for
4 both resident and migratory avian species, potential impacts to bird species, as well as potential impacts to
5 non-avian special status species and their habitat resources, could be significant.

6
7 SDG&E would implement multiple APMs, BMPs, and other protocols as described in its Subregional
8 NCCP that would minimize such impacts. Through incorporation of **APM-BIO-09**, which requires bat
9 surveys and avoidance of activities that could disturb bats, potential impacts to bat species would be less
10 than significant. However, because other potential impacts would remain significant even with
11 incorporation of SDG&E's other proposed measures, the applicant would also implement mitigation
12 measures to reduce potential impacts to plant and wildlife species, including habitat-related impacts, to
13 less-than-significant levels.

14
15 **MM BR-1** requires that the applicant conduct preconstruction surveys for sensitive biological resources
16 30 days prior to the start of construction within qualifying work areas, with a subsequent work area
17 biological survey if construction halts for at least 14 days in a given work area prior to recommencing in
18 that same work area. It also requires daily pre-construction biological clearance sweeps within work areas
19 containing suitable habitat for special status species. **MM BR-2** requires that the applicant designate
20 locations containing sensitive biological features including sensitive natural communities, aquatic
21 features, ESHAs, and special status species within or near work areas to ensure that construction activities
22 would not intentionally degrade such resources. **MM BR-3** requires that all workers attend a Worker
23 Environmental Awareness Program (WEAP) that would help crewmembers recognize and/or identify
24 potentially sensitive biological resources in work areas. **MM BR-4** would require biological monitoring
25 during construction activities in areas with the potential to support special status species, and within 50
26 feet of Environmentally Sensitive Areas. **MM BR-5** requires SDG&E to develop a Natural Community,
27 Tree, and Plant Protection Plan to ensure that sensitive natural communities, trees, and other plant species
28 are avoided if feasible, and restored appropriately if avoidance is infeasible. **MM BR-6** prohibits
29 construction within 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State
30 Natural Reserve Extension during Nesting Bird Season (February 1-August 31) in accordance with
31 SDG&E's proposed construction schedule. It additionally requires focused avian preconstruction surveys
32 in areas containing suitable habitat for special status avian species. Survey results may determine a need
33 for construction buffers up to 500 feet from lagoon areas, based on species need. **MM BR-7** would
34 minimize short-term habitat interference by ensuring that nighttime lighting is not directed into habitat
35 areas. Finally, **MM BR-8** prohibits interference with habitat and nectar resources used by two butterfly
36 species requiring special protection.

37
38 With SDG&E's APMs, BMPs, and additional protocols, as well as the MMs described above, impacts to
39 plant and wildlife species by means of both direct species impacts and indirect habitat degradation
40 impacts would be reduced to less than significant. Because there would not be any permanent impacts to
41 sensitive natural communities or habitat areas, impacts would be temporary and restricted to the
42 construction phase. Therefore, the proposed project would not substantially restrict the range of any
43 species known to utilize the project vicinity.

Cultural Resources

Project construction activities, such as those associated with excavation and earthmoving that would be required for hand holes and duct banks that would facilitate undergrounding of electrical circuits could potentially affect cultural and archeological resources through material impairment of artifacts. Potential damage or destruction of cultural, archeological or paleontological resources could preclude eligibility for listing on the California Register of Historical Resources if certain measures were not implemented to address potential adverse impacts during construction. The applicant would implement **MM CUL-1** to establish buffers around known archeological sites that would be demarcated by fencing that would restrict machinery and heavy equipment in areas thereby avoiding potential damage to subsurface resources. **MM CUL-2** would assign a qualified monitor to the site who would oversee construction work and evaluate and curate finds, if any, in the field. **MM CUL-3** requires the applicant implement cultural resources training to educate contractors working in the field about identifying potential resources and the procedures to follow should a potential resource be discovered. **MM CUL-4** establishes that a qualified archeologist shall be contacted in the event that a resource is discovered. The qualified archeologist would evaluate the discovery using CRHR and NRHP criteria and confer with the CPUC on the status of the find.

The proposed project, with implementation of the mitigation measures referenced above would not eliminate important examples of the major periods of California history or prehistory.

Significance: Less than Significant with Mitigation Incorporation.

b. Does the project have impacts that are individually limited, but cumulatively considerable?

The analysis of cumulative effects focuses primarily on the proposed project's construction activities relating to the reconfiguration of TL647A, removal of TL666D from service, and the conversion of portions of existing 12 kV distribution lines from an overhead to underground configuration and circuit breaker removal and replacement work at the Del Mar Substation. The analysis considers whether the project's cumulative impacts could combine with similar impacts from reasonably foreseeable projects in the study area; whether this potential combination of impacts would affect any of the environmental topics evaluated in Sections 5.1 through 5.18 of this Initial Study ~~would result in cumulative impacts~~; and, finally, whether project contributions to any cumulative impacts would be cumulatively considerable (significant). As previously discussed, the proposed project's O&M activities would not cause or contribute considerably to cumulative impacts and are therefore not addressed further in this analysis.

The proposed project would have no impact in the following resource areas: agriculture and forestry resources (the project would not convert prime farmland to nonagricultural use or preclude agricultural use where it may be permitted.); land use and planning (the project would neither disrupt nor divide existing communities or conflict with plans or policies adopted for the purpose of mitigating environmental effects); mineral resources (the project would not affect known mineral resources of value to the region); population and housing (the project would neither displace population or housing, nor would it require the construction of replacement housing); or tribal cultural resources. Therefore, the project would not combine with impacts of reasonably foreseeable projects to result in cumulative impacts related to these environmental topics. Further analysis of the above topics is not required.

Cumulative impacts resulting from construction of the proposed project could possibly occur in conjunction with the other reasonably foreseeable probable future projects. The analysis evaluates the project's potential to result in cumulative impacts in the following environmental subject areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- GHG Emissions
- Hazards/Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Impacts

Aesthetics

Aesthetic and visual resource effects are project-specific and highly localized; therefore, a list approach is used to evaluate potential cumulative impacts. The geographic scope of cumulative aesthetic impacts includes those areas where one or more foreseeable projects would be visible in conjunction with the proposed project from a public viewpoint. If shared view corridors are identified, the analysis must then determine whether the project's contribution would be "considerable" based on the project's potential to adversely affect scenic views and vistas; substantially degrade of the area's visual quality; damage scenic resources within a state scenic highway; or contribute to substantial light and glare.

Project construction work would be visible from certain key observation points along public streets and from workspaces that are in scenic areas. Views would include those of stringing sites, staging areas and fly yards, and of other areas where project construction work would occur in fore- and mid-ground views. Background, long-range views would continue to frame landscape features such as the Pacific Ocean, coastal bluffs, beaches, ridges, canyons, marshes, lagoons, mountains, hilltop parks and open spaces, features that local planning documents identify as *scenic*. Views of equipment and materials, trucks, helicopters, and personnel would be available for periods of days to several months depending on the duration of construction at a given location. Of the reasonably foreseeable projects listed in Table 5.19-1, two are located near the proposed project and may have construction schedules that potentially overlap with the proposed project:

- Watermark Del Mar
- El Camino Real Bridge/Road Widening Project

Structures and other infrastructure would obstruct views of these reasonably foreseeable projects simultaneously from public viewpoints. None of the remaining foreseeable projects would share the same viewshed with each other or with the proposed project. Further, views from the northern portion of Sorrento Valley Road, which is closed to vehicles, would be improved by the removal of seven poles in Los Peñasquitos Lagoon, which could constitute a beneficial, rather than adverse effect of the project on public vistas. Similarly, views from Carmel Valley Road would also become more natural in character resulting from the removal of utility poles. Therefore, the project's effect on scenic views and vistas would not be cumulatively considerable. A portion of I-5 located within the project area is considered

1 eligible for designation as a state scenic highway. As noted in ~~Section~~ Chapter 4.0, "Project Description,"
2 the proposed project would include removal of an overhead power line that crosses the I-5. There are no
3 probable future projects in the I-5 viewshed that would combine with the proposed project to exacerbate
4 visual quality impacts. Removing this feature from the corridor would not constitute a cumulatively
5 considerable impact nor preclude the corridor from being designated as scenic.

6
7 Construction of the proposed project would primarily occur during daytime construction hours, as
8 directed by local ordinances within the cities of San Diego and Del Mar. Some construction work such as
9 the removal of the TL666D conductor over I-5 may occur at night. The Initial Study identifies **MM BR-7**
10 that restricts nighttime lighting to minimal levels required by OSHA for worker safety and calls for
11 lighting to be focused on the specific work area and directed away from sensitive receptors and wildlife
12 corridors. If construction work were to occur at night, it could be surrounded by various other sources of
13 light, including possibly construction of other projects shown in Table 5.19-1, though none specify the
14 possibility of nighttime construction occurring. Given that nighttime construction work would be highly
15 localized, with light sources directed at specific work areas as required by **MM BR-7**, nighttime lighting,
16 even if other sources of lighting were nearby, would not be anticipated to contribute to cumulatively
17 considerable light and glare impacts. Therefore, the proposed project's aesthetic impacts would not be
18 cumulatively considerable.

19 20 Air Quality

21 The geographic scope for determining cumulative air quality impacts is the San Diego Air Basin (SDAB).
22 The San Diego Air Pollution Control District (SDAPCD) has adopted several attainment plans that
23 outline long-term strategies design to achieve compliance with National Air Quality Standards (NAAQS)
24 and California Ambient Air Quality Standards (CAAQS) within the SDAB.

25
26 Cumulative impacts on regional air quality are addressed by the SDAPCD thresholds of significance for
27 construction and operational criteria pollutant emissions and represent the levels at which a project's
28 individual emissions of criteria air pollutants and precursors would result in a cumulatively considerable
29 contribution regional air quality impacts. SDAB is in nonattainment for O₃ under both NAAQS and
30 CAAQS, and in nonattainment for O₃, PM₁₀, and PM_{2.5} under CAAQS. Past, present, and probable future
31 projects in the SDAB have resulted in the nonattainment status. The cumulative impact on existing air
32 quality violations in the SDAB and cumulative emissions from probable future projects of criteria
33 pollutants for which the SDAB are in nonattainment would be significant.

34
35 Emissions generated during construction of the proposed project would not exceed the SDAPCD
36 significance thresholds for ozone precursors in the SDAB and would not exceed SDAQMD significance
37 thresholds for any air pollutant (refer to Section 5.3: Air Quality, Impact b). The proposed project's
38 contribution to a significant cumulative impact to an existing air quality violation and nonattainment of
39 ozone would therefore be less than considerable.

40
41 SDG&E has agreed to implement four Project Design Features and Ordinary Construction Restrictions as
42 part of project construction to control and suppress fugitive dust and other related air quality impacts.
43 These design features and construction restrictions include to: secure bulk materials during transport to
44 and from staging areas; minimize heavy machinery use to avoid emission peaks; and reduce the use of

VOCs by using low- and non-VOC-containing coatings, sealants, adhesives, solvents and architectural coatings. By implementing these measures, uncontrolled and controlled emission rates from project construction would not exceed SDAPCD thresholds.

The construction schedule for the proposed project could potentially overlap with the construction schedules for the following reasonably foreseeable projects listed in Table 5.19-1:

- El Camino Real Bridge/Road Widening Project
- Street lighting in the Via De La Valle Underground Utility District

An additional fourteen projects have construction timelines that are unknown, which with varying levels of probability could overlap with the proposed project. Of the planned and proposed projects listed in Table 5.19-1 that may have potentially overlapping construction timelines with the proposed project and for which environmental impact documents are available, none would be anticipated to result in significant air quality impacts or exceed applicable air quality thresholds and conflict with applicable criteria air pollutants. The project's contribution to cumulative air quality impacts would be less than considerable.

Biological Resources

As described in Section 5.4, Biological Resources, the proposed project is anticipated to have temporary, less-than-significant impacts during construction in regards to sensitive species, sensitive natural communities, jurisdictional waters, and wildlife population and movement patterns. Cumulative impacts to biological resources could occur because of increased ground-disturbing activities by multiple projects. These cumulative activities could increase the distribution of normal animal breeding, foraging, and migration behavior, the removal of suitable habitat for multiple special-status plant and wildlife species, and the degradation of jurisdictional water features.

As previously discussed, construction of the proposed project and three of the projects listed in Table 4.19-1. An additional seven projects have construction timelines that are unknown and could overlap with the proposed project. Cumulative impacts to biological resources could occur as a result of increased ground-disturbing activities by multiple projects that could disrupt normal animal breeding, foraging, and migration behavior, as well as the potential removal of suitable habitat for multiple special-status plant and animal species, including species that are protected under the federal Endangered Species Act (FESA) and the California Endangered Species Act (CESA), particularly within portions of the proposed project. Other planned and proposed projects (e.g., El Camino Real Bridge/Road Widening Project No. 2982, Estates and Del Mar Subdivision, and Spectrum III and IV) would also have impacts to special-status species and their habitat. While the proposed project and other planned and proposed projects may impact sensitive species, all projects within the cumulative scenario would be subject to the same permitting requirements under the FESA and CESA, which are intended to minimize and mitigate impacts to species, both at the project level and in a regional context. Therefore, the project's contribution to cumulative impacts to sensitive species and critical habitat would be less considerable after the required avoidance, minimization, and compensatory mitigation measures are implemented.

The proposed project has been designed to avoid impacts to jurisdictional wetlands and waters and all proposed structures would be installed outside of the boundaries of jurisdictional wetlands and waters. With the implementation of SDG&E's Subregional NCCP Operational Protocols and Habitat Enhancement Measures, APMs identified in Section 5.4, Biological Resources, and **MM BR-1** through **MM RB-8** the proposed project would not contribute considerably to a cumulative impact to jurisdictional wetlands and waters.

As discussed in Section 5.4, Biological Resources, the proposed project is located within a number of wildlife corridors and preserve areas, including the San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve Extension, Multiple Habitat Planning Area, and the Pacific Flyway. The Spectrum III and IV project may have effects on wildlife movements, however, the project site is not designated as a Multiple Species Conservation Program regional wildlife corridor as it does not provide a throughway for wildlife species by connecting with major areas of off-site habitat. With implementation of SDG&E's Operational Protocols and Habitat Enhancement Measures, APMs, and **MM BR-1** through **MM BR-8** the project would not make a considerable contribution to cumulative impacts to native wildlife movements.

The proposed project would not conflict with local policies or conservation plans resulting in such conflicts causing significant impacts on the environment; the proposed project would similarly not contribute to a cumulatively considerable impact related to conflicts with local policies and conservation plans.

Cultural Resources

Cultural, paleontological and tribal resource impacts are highly localized in that these types of resources are affected in discrete areas; therefore, the cumulative cultural resources analysis uses a list-based approach to determine whether potential cumulative impacts could occur, and if so, whether the project's contribution to such impacts would be considerable. The geographic scope to cumulative cultural, paleontological and tribal resources would include all ground-disturbing projects within 100 feet of proposed project work areas that could materially affect the significance of known or as of yet unknown resources. The geographic scope is limited because cultural resources are discrete and typically not very large, such that two projects would need to be located near one and other (and both engage in similar soil-disturbing activities) to potentially impact – and exacerbate impacts – to the same resource.

As described in Section 5.5 Cultural Resources, the proposed project is anticipated to have temporary, less-than-significant impacts and less-than-significant impacts with mitigation incorporated during construction concerning historic, archaeological and paleontological resources, and potential for disturbance to human remains. Project construction activities could potentially affect six historic resources, one of which was determined to be eligible for inclusion in the California Register of Historic Resources (CRHR) as well as potentially affect six archaeological sites, four of which may be eligible for CRHR listing. These potential resources would be avoided or effects would be reduced to less-than-significant levels with implementation of SDG&E's Project Design Features and Ordinary Construction Restrictions and mitigation measures **MM CUL-1** through **MM CUL-4**.

While the potential for cumulative impacts to cultural resources during construction of these projects in combination the proposed project exists, it is unlikely that the project would make a considerable contribution to cumulative cultural resources impacts.

The planned and proposed project applicants would implement mitigation measures, such as requiring construction monitoring to address potential impacts to buried resources, to further reduce potential impacts. Further, relatively small segments of the proposed project would take place in previously undisturbed areas and SDG&E would implement Project Design Features and Ordinary Construction Restrictions to avoid or minimize potential impacts to cultural resources; therefore, the proposed project's cumulative contribution would not be significant.

Areas of the proposed project are underlain by geologic rock units/formations with high paleontological potential. As such, fossils may be encountered during excavation activities for the proposed project, and construction has the potential to impact paleontological resources. ~~The following planned and proposed projects also have potential to impact paleontological resources and could potentially have overlapping construction timelines:~~

Fossils may be encountered during construction of the other planned and proposed projects; however, most projects would occur within existing roadways or within areas that are previously disturbed or developed, where the likelihood of encountering paleontological resources is low. Further, to minimize any impacts to paleontological resources during construction, SDG&E would implement Project Design Features and Ordinary Construction Restrictions to ensure the proper salvage, relocation, and management of fossils if they are encountered during excavation in areas of high paleontological potential. While the project may have the potential to adversely affect paleontological resources, it is not anticipated to result in or contribute considerably to any cumulative impacts because the conditions for cumulative paleontological resource impacts are not met—that is, none of the foreseeable projects would necessitate ground-disturbing activities within 100 feet of the project such that soil disturbance resulting from the proposed project and from other reasonably foreseeable projects would exacerbate the potential for cumulative impacts. Therefore, no cumulative paleontological resource impacts are likely; potential impacts would be limited to project effects that would be subject to mitigation identified in this IS/MND and would not be cumulatively considerable. Additionally, similar strategies would be required for the planned and proposed projects that are underlain by geologic rock units/formations with high paleontological potential in the event of an unanticipated discovery. Therefore, with the implementation of Project Design Features and Ordinary Construction Restrictions, a cumulatively considerable impact to paleontological resources is not anticipated.

Geology and Soils

The project area is relatively flat and is not conducive to landslides nor is it in an area of known liquefaction danger; moreover, the project area would not intersect any known Alquist-Priolo Earthquake Fault Zone. Proposed project excavations would be relatively shallow (approximately 40 inches) and, for the most part, would be filled within 24 hours. The proposed project would also involve trenching, and bare soils would be exposed immediately following construction, which would be susceptible to erosion. As a result, the proposed project, in combination with other reasonably foreseeable projects, could have a potential cumulative effect with regard to soil erosion if measures addressing erosion are not

implemented. The proposed project, in combination with other reasonably foreseeable future projects would be required to comply with the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) permit requirements. Specifically, the applicant would prepare a Stormwater Pollution Prevention Plan (SWPPP) outlining best management practices to control discharge from project work areas. Moreover, as presented in Table 4-9, the applicant would implement **APM GEO-1** related to incorporating the recommendations and findings of the project's final geotechnical investigation pertaining to potential seismic activity, landslides, expansive soils, slope instability, and differential settling. As a result, the proposed project would not have a considerable contribution to a cumulative impact.

Greenhouse Gases

As previously discussed, climate change related impacts are global in nature and are generated by both direct and indirect project activities. Similarly, GHG analyses and thresholds are also inherently cumulative, so if a project would have less-than-significant effects under the applicable threshold of significance, the project would not contribute to cumulatively considerable GHG impacts. Emissions generated during the project's construction phase would not exceed applicable thresholds recommended by the South Coast Air Quality Management District and the County of San Diego. SDG&E is required to adhere to the standards and requirements established by the California Air Resources Board and the SDAPCD to minimize the potential for mobile equipment used during project construction to contribute to cumulative GHG emissions impacts. As such, the proposed project's contribution to cumulative GHG impacts would not be considerable.

Hazards and Hazardous Materials

Cumulative impacts to hazards and/or hazardous materials impacts could potentially result from the construction of concurrent projects as well as any increased risk the proposed project would have on the public or worker safety, including exposure to hazardous materials, physical hazards, or increased fire potential. SDG&E would comply with all applicable laws, rules, and regulations. Construction of the proposed project would require only small amounts of hazardous materials, and the transport of these materials would primarily occur during the approximately 12-month construction period.

The cumulative hazards and hazardous materials analysis uses the list approach to evaluate potential impacts. The geographic scope of cumulative impacts are project-specific and thus highly localized. The geographic scope would be the area immediately adjacent project work areas. This geography is limited because there is low risk of a hazardous materials spill or release of the project. Foreseeable projects in with overlapping construction timelines could have a temporary impact from accidental releases of diesel and gasoline fuel, hydraulic fluids, and other hazardous liquids from construction equipment. While there is potential for accidental spills and leaks during construction, there is no evidence to suggest that another spill would occur in the immediate vicinity during a similar timeframe. With the adherence to federal and state regulations, releases of hazardous materials from multiple sources simultaneously or in close proximity would be highly unlikely. Should small releases occur, they would be contained, cleaned and disposed of in accordance with applicable laws. As a result, cumulative impacts related to risk of spill or upset from hazardous materials are anticipated to be less than significant and the project's contribution to a cumulative hazards impact is not be considerable.

The majority of the project area is located within the California Department of Forestry and Fire Protection (CAL FIRE) Fire Resource and Assessment Program's (FRAP's) Very High Threat to People and High Threat to People classes. Construction activities could increase fire risk associated with the presence of vehicles, equipment, and human activity in areas of elevated fire hazard severity. Cumulative wildland fire risk could increase if reasonably foreseeable projects were concurrently undertaking construction with the project within high fire hazard areas. The potential for concurrent projects to cause heightened wild fire risk is reduced with the implementation of measure including implementing comprehensive brush management plans and reducing hazards inside and around the perimeter of work areas located in high-risk areas. All project-related impacts would be temporary in nature, and would not last beyond the approximate 12-month construction period. As a result, the proposed project would not have a considerable contribution to a cumulative impact.

Hydrology and Water Quality

A cumulative impact could result from multiple projects depleting groundwater supplies or involving a significant amount of grading in a shared watershed, which could alter natural drainage patterns, contribute to increases in runoff, or result in a degradation of water quality. There would be no cumulative impacts to groundwater depletion because water used for dust control during project construction would be obtained from a municipal source, which would not affect local groundwater supplies. As previously discussed, construction of the proposed project and three of the projects listed in Table 5.19-1 could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the proposed project.

The construction schedule of the El Camino Real Bridge/Road Widening Project could potentially overlap project construction activities, which may affect hydrology and water quality because of combined soil disturbance from grading, clearing, and excavation. These activities could cause erosion and sedimentation, and thus degrade water quality. However, the potential for soil erosion and sedimentation would be minimized through the implementation of SWPPPs, which would be required for all projects that disturb one or more acres of soil. Further, while minor alterations to drainage patterns could occur during construction of the proposed project, all areas disturbed during grading would be restored to original contours, and surrounding areas would be restored and repaired, as appropriate. With implementation of the SWPPP and BMPs, cumulative impacts to hydrology and water quality are expected to be less than considerable.

Noise

The simultaneous construction of the project in conjunction with other reasonably foreseeable projects may result in cumulative impacts to noise. As previously discussed, construction of the proposed project and two of the projects listed in Table 5.19-1 could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the proposed project. However, none of them are located adjacent to the proposed project. Other projects (e.g., the Estates at Del Mar Subdivision, and Del Mar City Hall/Town Hall Project) would also generate noise during construction, and a temporary cumulative increase in noise could result when construction of these and other projects occur simultaneously with construction of the proposed project.

Construction of the planned and proposed projects would generally be limited to the timeframes established by the local ordinances. Construction of the proposed project would also adhere to the adopted times when construction is allowed, and in cases where construction hours may local ordinances may be exceeded, variances from the standards ~~will~~ would be pursued and granted according to. Further, due to the linear nature of the proposed project, contribution to noise impacts due to construction of the proposed project at any one location would be limited in duration, and impacts would be temporary.

Public Services

Cumulative impacts to public services could occur if the service demands associated with the proposed project were to combine with those of other reasonably foreseeable projects resulting in substantial adverse physical impacts from the construction of new or physically altered government facilities. Potential environmental effects to public services and service providers include those relating to fire and police protection, schools, parks, as well as others such as medical facilities.

As discussed in Section 5.14, “Public Services”, the project would result in no impact or have less than significant impacts to public services. Construction of multiple projects at once in the project vicinity may incrementally increase demands for public services, but it would be speculative to conclude that increased demands on service providers even if considered in a cumulative context alone would result in significant environmental impacts. For the evaluation of public service impacts, the CEQA Guidelines are concerned with the possibility that *construction of new or physically altered government facilities* – not merely the potential increase in demand for public services – causes potentially significant environmental impacts. There is no evidence that the proposed project’s temporary demands on public service providers – either individually or in combination with those of reasonably foreseeable projects – would require new or physically altered facilities to meet heightened demands. Neither the proposed project nor the project in combination with other reasonably foreseeable projects would increase demands for public services that would necessitate the construction or expansion of new public facilities. The proposed project’s contribution to cumulative impacts on public services is therefore not considerable.

Recreation

Similar to the topic of public services, the criteria for evaluating project impacts to recreational resources asks whether a project would increase the use of existing neighborhood, regional or other parks and recreational facilities. If affirmative, the criterion then asks if the project would cause or accelerate substantial physical deterioration of the facility. The second criterion in evaluation of project impacts to recreation asks whether a project would require new or expanded recreational resources, which might have a substantial effect on the environment. As reported in Section 5.15, the project would not increase the use of parks or recreational facilities. Therefore, the project would not cause accelerated deterioration to existing local or regional recreational sites or facilities. Regarding the second criterion, no new or expanded recreational resources would be required of the proposed project, therefore there would be no direct construction impacts associated with this criterion.

In a cumulative context, the focus shifts from the proposed project’s potential direct effects (use) to potential indirect effects related to construction on recreational resources. Cumulative recreation impacts would be the impacts of the project on recreational facilities in combination with likely effects from reasonably foreseeable projects on recreational facilities. **MM REC-1** at requires the applicant to

document pre- and post-construction conditions at the Torrey Pines State Beach parking lot (that would be used as a Fly Yard) and at Del Mar Heights School (also used as a Fly Yard and materials staging and storage area) during construction. Documentation ensures that the temporary activities on those sites that provide recreational uses would be returned to preconstruction conditions and requires any surfaces be repaired if damaged or degraded by the temporary construction activities that would occur there. Given that no reasonably foreseeable project appears likely to have recreational impacts on these or any other recreational facility in the vicinity with which the potential effects of the proposed project would combine, the project would therefore not make a considerable contribution to cumulative recreational impacts.

Transportation and Traffic

Simultaneous construction of the proposed project and the planned and proposed projects could cause cumulative impacts to traffic. The proposed project would have short-term, temporary effects on traffic due to potential lane closures and construction requiring the implementation of traffic controls. During construction, construction work areas would likely cause congestion through the reduction of lane capacity serving the roadway network in the project vicinity. Cumulative effects would be any of the reasonably foreseeable projects occurring at the same time, within the same general vicinity of the proposed project while also contributing to construction-related temporary street closures and/or construction traffic and congestion. As previously discussed, construction of the proposed project and three of the projects listed in Table 5.19-1 could occur simultaneously, though as noted in the table, the San Dieguito track and trestle replacement project's funding source is not yet secured. In addition, seven foreseeable projects have construction timelines that are unknown and may overlap with the proposed project.

Congestion resulting from reduced roadway capacity from lane closures would likely increase in the surrounding area during concurrent construction of these projects. These effects would be temporary and intermittent and could affect emergency vehicle access and circulation as well. The proposed project would implement measures to notify emergency service providers in advance of any road closures prior to commencement of construction work. This advance notification could be used to coordinate and evaluate alternative routes for emergency vehicles to ensure network access and response times are not significantly affected by the lane closures and construction-related congestion attributable to the project in combination with other reasonably foreseeable projects. Similar to the proposed project, other future projects would obtain encroachment permits, and planned traffic control measures for each would be reviewed and coordinated by San Diego or Del Mar's planning and community development departments, depending on jurisdiction. Although project construction activities may occur simultaneously with those of foreseeable projects, effects would be intermittent, temporary and would be reduced to less-than-significant levels through coordinated reviews of encroachment permits and required traffic control plans.

The proposed project would have no impact to circulation plans or policy conflicts or air traffic patterns; therefore, it would not contribute to a cumulatively considerable impact related to circulation plans or policy conflicts or air traffic patterns.

1 Utilities and Service Systems

2 The proposed project is anticipated to have temporary, less-than-significant impacts during construction
3 in regards to wastewater treatment exceedances, water supply availability, and landfill capacity.
4 Cumulative impacts to utilities or service systems have the potential to occur if multiple projects have a
5 combined impact on local utility services or infrastructure. The proposed project would not generate
6 wastewater during construction; however, in the event that groundwater is encountered, dewatering may
7 be necessary. The water would be analyzed and treated, as necessary and would be discharged or disposed
8 of in accordance with applicable federal, state, and local requirements; and as such, the proposed project
9 would not contribute considerably to a cumulative impact.

10
11 The proposed project would use minimal amounts of water during construction activities to control dust
12 on non-paved portions of the proposed project area that would necessitate approximately 700,000 gallons
13 of water for this purpose. Construction of the proposed project would potentially overlap with three of the
14 projects listed in Table 5.19-1. Seven additional projects could also overlap with proposed project
15 construction, as their construction timelines are unknown. If these projects are constructed within the
16 same timeframe, they could produce a temporary, cumulative impact on water purveyors. However, all of
17 the applicants for the planned and proposed projects would need to coordinate with water providers prior
18 to construction to ensure that the providers can accommodate the demand. Because the proposed project's
19 relatively low water demand would be temporary and short-term, the impact on a water purveyor's long-
20 term water supply would be insignificant. Therefore, the proposed project's contribution to a cumulative
21 impact to water supply would be less than considerable.

22
23 Local area landfills could be impacted due to the increased cumulative need for disposal of construction
24 debris. The proposed project would generate limited quantities of construction waste (i.e., refuse, spoils,
25 trash, poles, etc.) that would ultimately be transported to the Miramar Landfill and disposed of properly in
26 accordance with all applicable federal, state, and local laws regarding solid and hazardous waste disposal.
27 The amount of daily construction waste for the projects listed in Table 5.19-1 is unknown; however,
28 construction debris would be generated by these projects as well. The Miramar Landfill accommodates
29 approximately 910,000 tons of waste per year, has the capacity to accept a total of approximately 15.5
30 million cubic yards of additional waste, and is expected to reach capacity by the year 2022. Solid waste
31 generated by the proposed project and other projects would decrease the capacity of the Miramar Landfill;
32 however, the amount would not be enough to significantly affect the capacity. Any impacts on landfills
33 caused by the construction and operation of the planned and proposed projects would also be required to
34 conform to the regulations and policies of the local jurisdictions. As a result, the cumulative impact not be
35 considerable.

36
37 Construction of the proposed project would have no impact to existing municipal water or wastewater
38 treatment systems, stormwater drainage facilities, or wastewater treatment capacity, and the proposed
39 project would not violate any solid waste statutes or regulation. The proposed project would utilize
40 minimal amounts of water during construction activities to control dust on non-paved portions of the
41 proposed project area. In total, approximately 700,000 gallons of water is estimated to be required.
42 Construction of the proposed project would potentially overlap with three of the projects listed in Table
43 5.19-1. Seven additional projects could also overlap with proposed project construction, as their
44 construction timelines are unknown. If these projects are constructed within the same timeframe, they

could produce a temporary, cumulative impact on water purveyors. However, all of the applicants for the planned and proposed projects would need to coordinate with water providers prior to construction to ensure that the providers can accommodate the demand. Because the proposed project's relatively low water demand would be temporary and short-term, the impact on a water purveyor's long-term water supply would be insignificant. Therefore, the proposed project's contribution to a cumulative impact to water supply would be less than significant. Local area landfills could be impacted due to the increased cumulative need for disposal of construction debris. The proposed project would generate limited quantities of construction waste.

Significance: Less than Significant with Mitigation Incorporation.

c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

The proposed project would not cause substantial adverse effects on human beings either directly or indirectly. The proposed project would result in temporary impacts to human health during construction, including changes to air quality, exposure to geologic hazards, and exposure to hazardous materials. As discussed in Section 5.3, "Air Quality," air quality effects would be less than significant. As discussed in Section 5.8, "Hazards and Hazardous Materials," hazard impacts would be less than significant with the implementation of APMs and mitigation measures, including preparation and implementation of a Hazardous Materials Management Plan and implementation of worker safety training and an updated Spill Prevention Control and Countermeasure Plan. Operation and maintenance activities would be comparable to current activities, and no additional impacts on human beings would occur.

Significance: Less than Significant.

References

- City of Del Mar. 2018. Agenda Center.
<http://www.delmar.ca.us/AgendaCenter/ViewFile/Minutes/785?MOBILE=ON>. Accessed December 16, 2018.
- City of San Diego. 2018. Capital Improvement Program. Featured Projects.
<https://www.sandiego.gov/cip/projectinfo/featuredprojects>. Accessed December 16, 2018.
- San Diego Gas and Electric (SDG&E). 2017. Proponent's Environmental Assessment for the TL674A Reconfiguration & TL666D Removal Project.

6.0 Mitigation Monitoring and Reporting Plan

Pursuant to Public Resources Code Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines, when an agency finds that mitigation measures have been required in, or incorporated into, a project to avoid or substantially lessen its significant environmental effects, the agency must adopt a program for monitoring or reporting on such mitigation measures. The purpose of this Mitigation Monitoring and Reporting Plan (MMRP) is to ensure effective implementation of the applicant proposed measures (APMs) and mitigation measures required by the California Public Utilities Commission (CPUC) that the applicant has agreed to implement in connection with the proposed TL674A Reconfiguration and TL666D Removal Project (proposed project). The MMRP, which is outlined in Table 6-1, includes:

- Each significant impact identified in the Initial Study/Mitigated Negative Declaration (IS/MND);
- APMs that the applicant has proposed as part of the design of the project and mitigation measures that have been identified in the Initial Study and agreed to be implemented by the applicant in order to reduce significant impacts to less than significant;
- Monitoring requirements;
- Timing for implementation of APMs and mitigation measures;
- Efficacy indicators for APMs and mitigation measures; and
- Reporting requirements.

~~This MMRP is a draft program. The CPUC will~~ has formalized this MMRP for inclusion in the Final IS/MND, ~~prior to construction, to include~~ It includes specific protocols that the applicant's designated environmental monitors and project staff (as described in Section 6.3, "Final Mitigation Monitoring and Reporting Plan") and its contractors shall adhere to prior, during, and after construction. The Final MMRP ~~will include, but not be limited to,~~ includes protocols and timelines for the following topics. The list below is not exhaustive:

- Agency Jurisdiction;
- Roles/Responsibilities;
- Communication;
- Compliance Verification and Reporting;
- Project Changes, including Minor Project Refinements; and
- Dispute Resolution.

The CPUC's designated Project Manager and environmental monitor (or monitors) will monitor the proposed project to verify full compliance with each APM and mitigation measure. The designated Project Manager will verify all compliance documentation required by APMs and mitigation measures, and the designated environmental monitor will regularly visit the proposed project to verify that APMs and mitigation measures are being implemented as described in the MMRP.

The CPUC-designated Project Manager and environmental monitor will keep a record of any incidents of non-compliance with mitigation measures, APMs, or other conditions of project approval, which will be supplied to the applicant and the CPUC. In all instances of non-compliance, the CPUC's designated Project Manager or environmental monitor may discuss necessary compliance corrections with the construction supervisor and/or the applicant's Project Manager. Continued non-compliance, or non-compliance that puts environmental resources at risk, will be reported immediately to the CPUC Project Manager. The CPUC (CPUC-designated environmental monitor, CPUC-designated Project Manager, or the CPUC Project Manager) may decide to halt work due to non-compliance.

6.1 Minor Project Refinements

This section describes the CPUC's process for staff approval of Minor Project Refinements (MPRs) that may be necessary due to changes needed after the applicant's final engineering of elements of the proposed project. During the course of construction, circumstances may arise that require minor deviations from the project as approved. The CPUC, along with the environmental monitors, would evaluate any proposed deviations from the approved project to ensure they are consistent with CEQA requirements. Depending on its nature, a requested deviation would be processed as an MPR or be the subject of a Petition for Modification (PFM) submitted by the applicant to the CPUC.

MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements, do not increase the severity of a significant impact or create a new significant impact, and are within the geographic scope of the IS/MND.

If a project change would create or have the potential to create a new significant impact, increase the severity of a significant impact, or occur outside the geographic area evaluated in the IS/MND, SDG&E would be required to submit a PFM. The CPUC would evaluate the PFM under CEQA, as appropriate, to determine what form of supplemental environmental review would be required.

6.2 Dispute Resolution

The following procedure will be observed for dispute resolution between CPUC staff and applicant:

- Disputes and complaints should be resolved at the field level to the extent feasible. If disputes and complaints cannot be resolved in the field, they shall be directed to the CPUC-designated Project Manager for resolution.
- Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the approved project.

6.3 Final Mitigation Monitoring and Reporting Plan

A Final MMRP ~~will be~~ was prepared for the Final IS/MND that incorporates ~~any the~~ changes to the proposed project, IS/MND text, and ~~or~~ mitigation measures that ~~are were~~ made ~~as a result of~~ during public review of the Draft IS/MND and further consideration of the proposed projects by the CPUC.

Table 6-1 ~~Draft~~ Final Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
GENERAL					
MM GEN-1: Implementation of All APMs. The applicant shall implement all APMs as stated in this environmental document, except in cases where specific APMs were superseded by mitigation measures. The APMs shall be incorporated into the Mitigation, Monitoring, and Reporting Plan.	CPUC verifies implementation of APMs.	Effectiveness criteria listed for each APM below.	Timing listed for each APM below.	Entire project area	<u>SDG&E</u> , CPUC
BIOLOGICAL RESOURCES					
APM BIO-01. During the appropriate phenological (i.e., blooming) periods, pre-construction surveys for special-status plants (specifically, federally listed, state-listed, and California Rare Plant Rank 1 and 2 plants) would be conducted within one year prior to the start of construction in areas that have the potential for special-status plants to occur. A hand-held Global Positioning System unit with submeter accuracy would be used to record the locations of special-status plant occurrences. Prior to construction, any occurrences of special-status plants that SDG&E determines to be avoidable will be marked with fencing or flagging, for avoidance during construction activities. Where disturbance to these areas cannot be avoided, SDG&E would restore temporarily impacted areas, as described in APM-BIO-05.	APM superseded by or incorporated in MM BR-1	See MM BR-1	See MM BR-1	See MM BR-1	See MM BR-1
APM BIO-02. Biological monitors would be present during all activities within special-status species habitat and sensitive natural communities. The biological monitors would conduct a pre-construction clearance survey of the work area and would verify that activities comply with the Project APMs and SDG&E's Subregional NCCP Operational Protocols.	APM superseded by or incorporated in MM BR-1, MM BR-2, MM BR-4	See MM BR-1, MM BR-2, MM BR-4	See MM BR-1, MM BR-2, MM BR-4	See MM BR-1, MM BR-2, MM BR-4	<u>See</u> MM BR-1, MM BR-2, MM BR-4
APM BIO-03. To minimize the spread of noxious and invasive weeds during construction, SDG&E would ensure that construction vehicles arrive to work sites clean and weed-free prior to entering the ROW in cross-country areas, ensure straw wattles (non-plastic) used to contain storm water runoff are weed-free, and document the extent of noxious weeds within the construction areas prior to construction. Noxious weeds are defined as species rated as High on the California Invasive Plant Inventory Database, published by the California Integrated Pest Council.	APM superseded by or incorporated in MM BR-5	See MM BR-5	See MM BR-5	See MM BR-5	See MM BR-5
APM BIO-04. Impacts to oak trees, Torrey pines, and other native trees will be avoided and/or minimized to the extent possible during construction. In the event that any native trees are required to be removed, SDG&E will comply with all applicable City of San Diego and/or City of Del Mar requirements for tree preservation and mitigation.	APM superseded by or incorporated in MM BR-5	See MM BR-5	See MM BR-5	See MM BR-5	See MM BR-5

Table 6-1 **Draft Final Mitigation Monitoring and Reporting Plan**

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
APM BIO-05. All areas disturbed as a result of construction activities will be re-contoured and restored to the original conditions to the extent feasible including using soil salvaging and special-status plant protections as described in SDG&E's Habitat Enhancement Measures. These areas will be allowed to revegetate naturally.	SDG&E and/or its contractors verify soils at work sites disturbed during construction are re-contoured and restored as directed in Habitat Enhancement Measures and by other requirements as applicable.	By using salvaged soil and Implementing special-status plant protections, disturbed areas would be restored to their preconstruction conditions as feasible and plants would revegetate naturally.	During and after project construction during restoration	Entire project area and specifically where excavation occurs for duct work and footings for utility poles.	<u>SDG&E</u> , CPUC
APM BIO-06. A Nesting Bird Management Plan will be prepared to outline procedures for minimizing impacts to nesting birds protected by the Migratory Bird Treaty Act during construction. The plan will address how to avoid direct or indirect impacts to nesting birds through various measures, including: <ul style="list-style-type: none">conducting pre-construction nesting bird surveys during specified breeding times within a certain distance of the construction areas;establishing avoidance and minimization buffers for active nests based on species-specific noise tolerances;describing construction activities that can occur within avoidance and minimization buffers;implementing procedures for reducing buffers as appropriate; andmonitoring protocols to document compliance with the Nesting Bird Management Plan, including daily nesting bird reports, during construction. The Nesting Bird Management Plan will be implemented during construction for all potentially affected bird species.	APM superseded by or incorporated in Mitigation Measure MM BR-6	See MM BR-6	See MM BR-6	See MM BR-6	See MM BR-6
APM BIO-07. If a special-status wildlife species is identified on site during construction, crews will temporarily stop work in the immediate vicinity of the animal and immediately contact the biological monitor or designated SDG&E representative. Work will not proceed until the animal has moved out of harm's way on its own or has been relocated by a qualified biologist.	APM superseded by or incorporated in Mitigation Measure MM BR-4, BR-6	See MM BR-4, BR-6	See MM BR-4, BR-6	See MM BR-4, BR-6	See MM BR-4, BR-6
APM BIO-08. Nighttime construction lighting in suitable habitat for special-status wildlife and nesting birds will be minimized to the extent feasible. Exterior lighting within and adjacent to potential special-status wildlife habitats will utilize the lowest illumination allowed for human safety and will be selectively placed, shielded, and directed away from suitable special-status species habitat, to the maximum extent practicable.	APM superseded by or incorporated in Mitigation Measure MM BR-7	See MM BR-7	See MM BR-7	See MM BR-7	See MM BR-7

Table 6-1 **Draft Final Mitigation Monitoring and Reporting Plan**

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
APM BIO-09. Prior to construction, a habitat survey for potential bat roosts that may be impacted by construction activities will be conducted. During the survey, potential roost sites will be searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. Up to two weeks prior to construction, a qualified biologist will conduct bat surveys at roost sites identified as potentially active from signs of bat use identified during the survey. If bats are detected, SDG&E will avoid conducting construction activities that may directly impact the active roost site. If an active maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31)	SDG&E and/or its contractors shall prepare a habitat survey for bat roosts potentially impact by project construction.	Depending on survey results, SDG&E to avoid construction activities that may directly affect roost site and ensure construction buffers are at least 200 feet from roosts between April 1 through August 31.	Surveys conducted two weeks prior to beginning of construction and during pupping season, April 1 through August 31.	Entire project site or likely roost areas specified in survey	<u>SDG&E</u> , CPUC
APM BIO-10. To the maximum extent feasible, construction vehicles and equipment will be refueled, maintained, and repaired at least 100 feet away from a wetland or water feature. If refueling, maintaining, or repairing equipment and vehicles in or within close proximity to wetlands is unavoidable, appropriate secondary spill containment will be used to prevent spills in sensitive habitats.	APM superseded by or incorporated in MM BR-2	See MM BR-2	See MM BR-2	See MM BR-2	<u>SDG&E</u> , CPUC
MM BR-1: Preconstruction Surveys. Thirty days prior to the start of construction activities in new work areas that have the potential to impact biological resources (e.g., staging, vegetation clearing, trenching, helicopter activities, pole removal, stringing, stockpiling), a CPUC-approved biologist shall conduct preconstruction surveys for sensitive biological resources within all qualifying work areas, including access roads, footpaths, fly yards, stringing sites, pole removal sites, etc. In efforts to minimize the extent of human activities within San Dieguito Lagoon and Los Peñasquitos Lagoon while maintaining worker safety, preconstruction surveys in the lagoon areas will be conducted from a safe distance that still allows for adequate biological observation (via binoculars or other means). Lagoon areas that are accessible by foot shall undergo standard preconstruction surveys. If construction activities halt within a work area for fourteen days, the biological monitor shall recheck the work area for any sensitive biological resources prior to the re-commencement of construction activities. Avian surveys shall be conducted in accordance with SDG&E's Subregional NCCP as well as all other applicable requirements, as described in MM BR-6: Nesting Bird Management Plan. Prior to the start of daily project-related activities within all work areas, all areas with habitat suitable to support special status plants and wildlife, and all areas and places in which wildlife could become trapped (trenches, holes, excluded areas, etc.) shall undergo a daily biological clearance sweep, to be conducted by a qualified, CPUC-approved biological monitor. Only after verbal clearance by the biological monitor may project-related activities commence within work areas.	CPUC to verify completion of surveys and avoidance or minimization of impacts to special status species.	Preconstruction surveys are conducted 30 days prior to the start of construction, and appropriate measures are implemented to prevent disturbance or damage to biological resources from activities within and adjacent to sensitive habitat.	During pre-construction, construction, and restoration, as applicable	Entire project area	<u>SDG&E</u> , CPUC

Table 6-1 **Draft Final Mitigation Monitoring and Reporting Plan**

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
<p>MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed prior to the start of construction activities. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features.</p> <p>To minimize the potential for human-related impacts in sensitive areas, fencing, flagging, or signage shall not be required in helicopter access-only work areas within San Dieguito Lagoon or Los Peñasquitos Lagoon. However, as described in MM BR-4, a CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. In work areas located outside of the lagoons or within the lagoons by fully accessible by foot, in which construction activities are anticipated to last less than one day, fencing and flagging installation will not be required, but a CPUC-approved biological monitor must be present to observe construction activities per MM BR-4. Equipment such as PVC conduit, which could potentially entrap wildlife, shall be inspected by a qualified, CPUC-approved biological monitor prior to use. Areas that would be subject to excavation (e.g., trenches and holes), shall be excluded and fully covered at the end of each day to prevent wildlife from falling in and becoming entrapped. If a trench or hole cannot be fully covered at the end of the day for any reason, the applicant shall install wildlife escape ramps at least every 100 feet, which shall have slopes no greater than 2:1.</p> <p>Environmentally Sensitive Areas (areas with substantial biological resources such as special status species, sensitive natural communities, occupied and/or suitable habitat, or aquatic features), including Environmentally Sensitive Habitat Areas (ESHAs) and potentially jurisdictional aquatic features (under USACE, CDFW, RWQCB, and/or CCC jurisdiction), shall be clearly flagged, fenced, and/or indicated by signage to prevent inadvertent disturbance or trampling. Adequate buffer distances surrounding Environmentally Sensitive Areas shall be determined by the CPUC-approved biological monitor, based on the biological sensitivity of the resource and the nature of the approved project-related activities occurring nearby. Buffers between staging areas, stringing sites, and both ESHAs and wetland areas shall be no less than 50 feet, unless it is determined by the onsite, CPUC-approved biologist that a lesser buffer distance is appropriate.</p>	Verify demarcation and avoidance of project boundaries and sensitive areas.	Measure includes various requirements to protect sensitive habitat and biological resources and prevent substantial, adverse disturbance from construction activities such as: delineating work areas; establishing buffers; limiting access for monitors; installation of wildlife ramps, covering open trenches and setting back equipment storage areas from sensitive aquatic features, etc.	<p>Before construction: Install exclusionary fencing, flagging and signage prior to the start of construction activities</p> <p>During construction: Install wildlife escape ramps and cover active excavation pits daily during construction. Request to amend minimum buffer areas must be directed must be directed to the CPUC, and should involve consultation with relevant agencies (USFWS, USACE, CDFW, and/or CCC)</p>	Environmentally Sensitive Areas within project area	<u>SDG&E</u> , CPUC, possibly USFWS, USACE, CDFW, and/or CCC

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Buffer distance reduction requests must be directed to the CPUC, and should involve consultation with relevant agencies (USFWS, USACE, CDFW, and/or CCC) as needed.					
MM BR-3: Worker Training Program. The applicant shall develop a Worker Environmental Awareness Program (WEAP), to be submitted to the CPUC for review and approval, that shall be administered to all project-related staff who will conduct on-site work (e.g., construction crews, management, monitors, contractors, sub-contractors, etc.). The applicant shall submit to the CPUC monthly documentation of who has undergone WEAP training. The WEAP shall describe the sensitive biological resources (plants, wildlife, and sensitive natural communities) that crews may encounter onsite, mitigation measures that shall be used to reduce impacts to these resources, the penalties associated with violations of the conditions of the IS/MND, acquired permits, and SDG&E's best management practices (BMPs). Additionally, the applicant shall develop an informational handout or booklet for each employee that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.	SDG&E and/or its contractors will develop and implement a Worker Environmental Awareness Program (WEAP), to be submitted to the CPUC for review and approval. Training shall apply to all conducting work on-site. SDG&E will document participation in training program and submit monthly reports to CPUC. CPUC reviews and approves the program and verifies that new personnel are trained by reviewing training records.	Worker Education Awareness Program is approved by the CPUC, and all workers involved in field operations attend the WEAP. CPUC receives and reviews training records to ensure that all workers have received training through the WEAP.	Prior to Construction – CPUC approval, and WEAP screening before start of construction During Construction – Monitor will continue to enforce policies highlighted in the WEAP	Entire project area	<u>SDG&E</u> , CPUC
MM BR-4: Construction Monitoring. The applicant shall ensure that a qualified, CPUC-approved biological monitor is present at all times to monitor ground-disturbing activities (e.g., grading, vegetation removal, trenching, digging, etc.) in areas that have the potential to support special status species. All ground-disturbing activities that would occur within 50 feet of Environmentally Sensitive Areas (areas supporting special status species, sensitive natural communities, and aquatic features), ESHAs, and all potentially jurisdictional aquatic features (non-wetland waters of the state, wetlands, streambeds, open water, tidal waters, and jurisdictional natural communities) will be monitored. To minimize the potential for human-related impacts in sensitive areas and to maintain worker safety, a biological monitor shall not be present to observe project activities within helicopter access-only work areas in San Dieguito Lagoon or Los Peñasquitos Lagoon. The CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. <u>When the CPUC-approved biological monitor must observe project activities from a safe distance, the monitor will maintain communication with pole removal technicians, both before and after each workday, to ensure that appropriate biological resource protection protocols are implemented.</u> In work areas located outside of the lagoons, <u>including upland habitat</u>	CPUC verifies that SDG&E and/or its contractors include monitors onsite at all times during ground-disturbing activities in areas potentially supporting special status species.	Monitors to ensure construction activities adhere to spatial restrictions and that sensitive habitats and biological resources are buffered from human activity and construction impacts.	During construction	Project area's Environmentally Sensitive Areas	<u>SDG&E</u> , CPUC

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within Torrey Pines State Natural Reserve Extension, and in work areas or within the lagoons by but fully accessible by foot, the CPUC-approved biological monitor shall be present to observe project activities as described above. Areas within existing pavement that do not have the potential to support special status species will receive a pre-construction survey and spot-checks, as determined by the biological monitor in accordance with SDG&E's NCCP. The biological monitor shall have temporary stop-work authority if he or she determines that project-related activities present a threat to sensitive biological resources. If the biological monitor must stop work due to threat to a biological resource, work may resume once the biological monitor determines that activities will no longer risk or endanger the resource, or upon further consultation with the appropriate agencies (CDFW, USFWS, USACE, RWQCB, or CCC).					
MM BR-5: Natural Communities, Plant Protection Plan, Tree Protection and Preservation Plan, Natural Communities, Protected Tree, and Plant Protection Plan. To minimize project-related impacts to natural communities, <u>protected</u> trees, and special status plants, SDG&E shall adhere to the enhancement and restoration components of the NCTPP <u>Natural Communities, Protected Tree, and Plant Protection Plan (Plan)</u> , including the Quality Assurance restoration protocols described in Chapter 7.2 Habitat Enhancement Measures. Additionally, prior to construction, the applicant shall ensure that special status plant surveys are conducted during appropriate phenological (blooming) periods within one year prior to the start of construction to ensure detection. If detected, special status plants shall be flagged for avoidance. All <u>reasonably</u> accessible Del Mar manzanita (<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>) observed within 50 feet of directly adjacent to, or within, or proximal to proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction. <u>This measure applies to Del Mar manzanita plants that could be inadvertently accessed and impacted by project activities, and does not apply to Del Mar manzanita plants that are difficult to access and that would be unlikely to be reached by construction crews or equipment.</u> Additionally, no fewer than fourteen <u>30</u> days prior to the start of construction, the applicant shall develop and submit to the Plan to the CPUC (NCTPP), which shall include, at a minimum, the following: <ul style="list-style-type: none">A Restoration Strategy, including a long-term monitoring strategy, for each <u>protected</u> tree species and special status plant species that is known to occur within or near (within 50 feet) proposed work areas, and that therefore could be impacted by proposed project activities. If a single restoration strategy and/or long-term monitoring strategy would be effective for multiple species or for groups of species, the	CPUC verifies that SDG&E and/or its contractors adhere to enhancement, restoration are addressed prior to construction and if applicable a restoration and monitoring strategy has been prepared in the form of a Natural Community, Tree and Plant Protection Plan to address work that may occur near special status species, including aquatic features in ESHAs, noxious and invasion weed control and strategies for protected trees to be developed in consultation with an arborist if applicable. The restoration and monitoring strategy would be applicable to all protected, special status species known to occur within 50 feet of work areas 30 days prior to commencement of construction work.	Preconstruction surveys conducted within 30 days of the start of construction, and appropriate Plan measures are implemented to prevent disturbance to special status plant species and spread of invasive weeds within or near the construction area.	Surveys completed 30 days prior to beginning of construction. Measures and Plan protocols implemented during construction and restoration.	Entire project area	<u>SDG&E, CPUC, CDFW, USFWS, (CFG, local city arborist/forestry management agency)</u>

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<p>discussion may be inclusive of all applicable species, as appropriate Long-term monitoring strategies should ensure successful restoration and recolonization by the intended species.</p> <ul style="list-style-type: none">• Restoration and long-term monitoring plans for natural communities including aquatic features and ESHAs that may experience project-related impacts.• A Noxious and Invasive Weed Control Strategy to prevent the colonization of noxious and invasive weeds in areas disturbed by proposed project activities. The strategy shall include a procedure for washing, inspecting, documenting, and approving vehicles and equipment prior to being staged anywhere within the project area.• Methods of communication between the applicant, the CPUC, and local qualified city arborists to discuss which protected trees, if any, may require trimming before or during project construction, and which protected trees may be subjected to construction activities within 20 feet of the Dripline Area. <p>Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP Plan shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, <u>protected</u> trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet) of a work area, SDG&E must avoid the resource, and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP Plan within fourteen <u>30</u> days of initial observation, for review and approval.</p>					
<p>MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections. Additionally, the applicant shall not conduct project-related activities within at least 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), or Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31). A CPUC-approved avian biologist who is knowledgeable about avian species native to the coastal San Diego region shall conduct special status avian surveys where construction would occur during nesting bird season. The avian biologist shall conduct focused avian preconstruction surveys no more than fourteen days before project activities begin in each workspace, in areas containing or adjacent to suitable habitat for special status avian species. <u>For project areas within 500 feet of or within suitable habitat for Western</u></p>	<p>CPUC verifies that any construction activities occurring between February 1 and August 31 are preceded by a preconstruction survey to identify active nests with the potential to be disturbed by construction. If an active nest is discovered, the biologist will implement appropriate measures to prevent disturbance. Survey results shall be submitted to the CPUC.</p>	<p>Preconstruction surveys for active bird nests are conducted within <u>7-14</u> days of the start of construction, and appropriate measures are implemented to prevent disturbance to any nests within or near the construction area.</p>	<p>Prior to construction – conduct surveys to identify active nests with the potential to be disturbed by construction, within <u>7-14</u> days of the start of construction</p> <p>During construction – If an active nest is found with the potential to be disturbed by construction activities, the approved biologist implements appropriate measures to reduce disturbance, and monitors the nest</p>	<p>entire project area</p>	<p><u>SDG&E, CPUC, CDFW, USFWS</u></p>

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<p><u>Snowy Plover (<i>Charadrius alexandrinus nivosus</i>)</u>, the surveying avian biologist must have documented experience surveying <u>Western Snowy Plover</u>. Surveys shall be conducted within work areas plus a buffer large enough to encompass the next nest buffer of any special status avian species for which suitable habitat is present (i.e., 100 to 500 feet). In work areas that contain no suitable or potentially suitable habitat for special status avian species, and that would not be subject to any ground disturbance or vegetation trimming/removal, focused avian preconstruction surveys are not necessary.</p> <p>If nesting birds are observed within 500 feet of work areas within or adjacent to the lagoons, Torrey Pines State Natural Reserve Extension, ESHAs, or other proposed work areas during focused avian surveys or general preconstruction surveys (see MM BR-1), the avian biologist shall establish <u>appropriate, species-specific</u> vertical and horizontal buffers between project activities and established nests and territories. to be no less than The buffers shall be no less than 500 feet (vertical and horizontal) for all <u>raptors, Coastal California Gnatcatcher, and Western Snowy Plover</u> nests (unless otherwise approved by USFWS and/or CDFW). Buffers between project activities and other avian nests shall be established on a species-specific basis, based on <u>USFWS and CDFW recommendations and avian biologist observations</u>. the following distances for each species:</p> <ul style="list-style-type: none">500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plovers;300 feet (vertical and horizontal) for all other special status avian species (passerine, waders, etc.); and100 feet (vertical or horizontal) from nests of non-special status avian species. <p>If non-nesting special-status avian species are observed, project activities may resume at distances greater than 100 feet from <u>San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), and Torrey Pines State Natural Reserve Extension</u> during nesting bird season (February 1 to August 31), but a CPUC-approved biological monitor must be present. If <u>project activities would occur between 100 and 500 feet of occupied (non-nesting) Western Snowy Plover habitat</u>, then an avian biologist with documented experience surveying <u>Western Snowy Plover</u> must be present to observe all project activities.</p> <p>The nest buffer distances described above Nest buffer distances may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and</p>					

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<p>defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. <u>The applicant shall notify the CPUC, USFWS, and CDFW of nest buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for nest-buffer reductions to special status species and raptor nests and will provide verification to the CPUC of this coordination when reducing such buffers. Nest buffer reductions for common, non-special status species shall be reduced as established by protocols established in the Nesting Bird Management Plan (NMBP). Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species.</u> All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.</p> <p>The applicant shall develop an Nesting Bird Management Plan (NBMP) in accordance with the Avian Power Line Interaction Committee (APLIC) and USFWS guidelines (APLIC and USFWS 2005), to be submitted to the CPUC no fewer than 30 days prior to the start of construction. The plan shall contain, at a minimum, the following information and strategies intended to minimize impacts to avian species:</p> <ul style="list-style-type: none">• Methods from APLIC Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012) that would minimize the risk of avian collisions, injuries, and electrocutions associated with new poles and aboveground utility features, including those associated with the C738 and C510 conversions;• Species-specific USFWS and/or CDFW survey protocols and planned compliance procedures with the protocol(s),• Survey timing, methods, and boundaries, protocols for determining whether a nest is active and how to protect active nests, documentation and reporting methods for observed active nests, and surveyor qualifications;• Nest documentation (nest activity, active/inactive, etc.) and an established procedure for contacting the appropriate agencies (CPUC, CDFW, USFWS) with inactive nest removal requests for review;• Nesting bird deterrent methods for activities to be conducted outside of the lagoons and Torrey Pines State Natural Reserve, but within nesting bird season;• Species-specific buffer determinations relating to project components and protocols for requesting a reduced buffer distance from the CPUC and from the wildlife agencies; and					

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<ul style="list-style-type: none">Language indicating that buffer distances shall be based on biological data and site/species-specific observations, not generalized assumptions.					
MM BR-7: Nighttime Lighting Protection. Any lighting required for construction activities, including activities that would occur at staging areas/fly yards, stringing sites, drop zones, and other work areas, shall be minimized to the extent feasible, and shall utilize the lowest illumination necessary for worker safety, in accordance with Occupational Health and Safety Administration standards. Lighting shall be selectively placed, oriented downward, and shielded to minimize offsite light spill. Nighttime lighting in wildlife corridor areas shall be of low-sodium or similar lighting methods, in accordance with the City of San Diego MHPA requirements. Construction equipment and vehicle speeds on unpaved roads during nighttime activities shall be restricted to 15 miles per hour as described in SDG&E's NCCP, and biologists shall conduct vehicle checks for trapped or concealed wildlife prior to moving equipment after dark to minimize strike and collision risk to nocturnal wildlife species. Lights shall not be left on during nighttime hours, except as required for nighttime work and/or an emergency.	SDG&E and/or its contractors shall incorporate protocols as listed in the mitigation measure to ensure nighttime lighting does not substantially or adversely affect sensitive receptors and nearby wildlife.	Minimizing usage, using low-sodium light sources in wildlife areas, directing cone of light downward and away from adjacent land uses and sensitive receptors would ensure that nighttime lighting effects of the project are less than significant.	During nighttime construction work	Entire project area	<u>SDG&E</u> , CPUC
MM BR-8: Butterfly Protection. Any tree trimming that would occur during western monarch butterfly overwintering season (September-February) shall be observed by a CPUC-approved biological monitor who is knowledgeable about western monarch butterfly ecology and life history. The monitor shall inspect the tree to determine the presence of overwintering western monarch butterflies, or to determine if the tree has a high potential to support overwintering western monarch butterfly populations, based on tree species and historic overwintering western monarch butterfly occurrences (see Table 5.4-10). Trees may only be trimmed or removed if the biologist determines that they do not support overwintering western monarch butterfly populations. No Torrey pines or eucalyptus trees may be trimmed within the San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve Extension, or the locations identified in Table 5.4-10 during overwintering season. To minimize the potential for impacts to wandering skipper, a Narrow Endemic Species, and in accordance with SDG&E's NCCP, the applicant shall not conduct construction activities within San Dieguito Lagoon or Los Peñasquitos Lagoon during peak flight season (July-September). If construction activities within any work areas (within or outside of lagoon areas) would result in the removal of or damage to the wandering skipper host plant (salt grass) or to native nectar sources known to support western monarch butterfly, the applicant shall restore the nectar sources at a 1:1 ratio, restoring salt grass directly, and restoring monarch	CPUC shall approve a biological monitor oversee any tree trimming that would occur between the months of September and February to determine whether subject trees would be suitable butterfly habitat.	Restricts tree trimming during months of September to February to those trees found to not support overwintering monarch butterfly populations. Prohibits trimming of Torrey Pines and eucalyptus within San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve Extension, or other locations as specified in Section 5.4, "Biological Resources."	For the western monarch: from September to February For the wandering skipper: from July to September	Entire project area	<u>SDG&E</u> , CPUC, <u>CDFW</u>

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butterfly nectar sources either directly, or as described by the California Coast recommendations (Xerces 2016b). Only native milkweed species may be used for restoration.					
CULTURAL RESOURCES					
<p>MM CUL-1: Archaeological Site Buffer. Buffers shall be established around each of the significant, known archaeological sites in areas where ground disturbance is anticipated, and the sites will be noted as “environmentally sensitive areas” to preserve confidential locational information as required by law. Information relating to the exact location of these sites shall be considered confidential and shall not be made publicly available to prevent unauthorized discovery and disturbance of archeological resources in conformance with state law.</p> <p>The buffer may consist of radial silt fencing or other means of identifying the area in which construction or ground disturbance must be avoided. Mapping and other discoverable publications shall redact citations to the specific locations of these resources.</p>	CPUC will verify that SDG&E and/or its contractors will establish setbacks and buffers through the use of fencing around known archeological sites and characterize them as “environmentally sensitive areas” to preserve confidentiality as required by law.	CPUC <u>verifies that SDG&E and/or its contractors erect protective barriers with appropriate signage around any environmentally sensitive areas - approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.</u>	<p>Prior to construction – SDG&E and/or its contractors will identify and map environmentally sensitive areas near work sites</p> <p>During construction – SDG&E and/or its contractors will install fencing as buffers around sites that <u>may are known to contain sensitive archaeological resources, and</u> that will be avoided.</p> <p>After construction – SDG&E and/or its contractors will remove fencing once construction activities are complete.</p>	Within project area at specific work sites where construction activities may adversely affect known resources	<u>SDG&E, CPUC</u>
<p>MM CUL-2: Cultural Resources Monitoring. <u>The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project's qualified archaeological monitor.</u></p> <p><u>A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project via a Cultural Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days prior to the start of project activities. The Cultural Resources Monitoring Plan shall include, at minimum, information regarding the location of project work areas/sites requiring cultural resources monitoring, how monitoring will be conducted, and the respective roles and responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified archaeologist. Responsibilities for the CPUC-approved archaeological monitor shall include cultural resources monitoring and implementing stop-work authority in the event of an unanticipated cultural resources discovery during project activities. Responsibilities of the SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to recommence project activities after a stop-work order</u></p>	<p><u>CPUC will verify that SDG&E notified tribes at least 30 days prior to ground-disturbing construction activities to voluntarily observe such activities and offer any recommendations to the project's CPUC approved archaeological monitor.</u></p> <p><u>“The CPUC-approved archaeologist, overseen by an SOI-qualified archaeologist, verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors and the archaeological monitor documenting the results of archaeological monitoring.”</u></p>	<p><u>CPUC verifies that SDG&E notified tribes at least 30 days prior to ground-disturbing construction activities by obtaining copies of notifications and proof of delivery.</u></p> <p>The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described in <u>implement the procedures in MM CUL-4</u> if an unanticipated archaeological resource is discovered during construction. <u>The SOI-qualified archaeologist maintains regular communication with the CPUC-approved archaeological monitor to provide oversight when needed.</u></p>	<p><u>At least 30 days prior to ground-disturbing construction activities SDG&E notifies tribes and provides the CPUC copies of notifications and proof of delivery.</u></p> <p>Prior to construction, SDG&E and/or its contractors submits the resume of a qualified archaeologist to be reviewed and approved by the CPUC. During construction, archaeological monitor conducts monitoring in accordance with described protocols. Post-construction, the qualified archaeologist prepares and submits a report documenting the results of archaeological monitoring, for review by the CPUC.</p>	<u>Entire Project areas that will undergo ground-disturbing construction activities. All cultural resource sites of significance identified within the project area.</u>	<u>SDG&E, CPUC</u>

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<p>has been installed to protect potential cultural resources, analysis and curation of materials, and preparation of a monitoring activities results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.</p> <p>Where cultural resources monitoring is needed at project work areas/sites within California State Parks Lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.</p>					
<p>MM CUL-3: Cultural Resource Training. Prior to construction, all SDG&E, contractor, and subcontractor personnel associated with the proposed project shall receive training in the appropriate work practices necessary to effectively identify and implement treatment of cultural resources and to comply with the applicable environmental laws and regulations, including those related to recognizing possible buried resources and maintaining the confidentiality of resources at in-situ locations. This training shall include how to identify cultural resources (e.g., the types of resources to look for) and what procedures are to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as paleontological resources.</p>	<p>CPUC verifies that SDG&E and/or its contractors designs and provides a Cultural Resource Training that provides a comprehensive review of the cultural, archaeological, and paleontological history of the proposed project area. CPUC approves the program and verifies that new personnel are trained by reviewing training records.</p>	<p>A Cultural Resource Training is approved by the CPUC, and all workers involved in field operations attend the Cultural Resource Training. CPUC receives and reviews training records to ensure that all workers have received training through said program.</p>	<p>Prior to Construction – CPUC approval, and Cultural Resource Training is held before start of construction.</p> <p>During Construction – Monitor will continue to enforce policies highlighted in the Cultural Resource Training program.</p>	<p>Entire project area</p>	<p><u>SDG&E</u>, CPUC</p>
<p>MM CUL-4: Cultural Resource Discovery. In the event that cultural resources are discovered during construction, the applicant's archaeologist and Environmental Project Manager shall be contacted upon the time of discovery. The field resource specialist shall evaluate the significance of discovered resources using CRHR and NRHP criteria and accepted practices. The CPUC must concur with the treatment of significant resources before construction activities in the vicinity of the discovery shall be allowed to resume.</p> <p>For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution or repatriated or redeposited in a secure location onsite if curation is infeasible. All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or</p>	<p>If an undiscovered historical or archeological resources are encountered, CPUC verifies that work has been halted and a qualified archaeologist is contacted to assess the discovery.</p>	<p>Work is halted if unanticipated fossil <u>remains artifacts or other cultural resources</u> are discovered and the proper protocols implemented pertaining to the treatment of said artifacts.</p>	<p>During construction</p>	<p>Entire project area</p>	<p><u>SDG&E</u>, CPUC</p>

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APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
history of the area. Faunal material shall be identified as to species.					
<p>MM CUL-5: Paleontological Resource Monitoring and Discovery. A qualified paleontologist shall attend pre-construction meetings, when needed, to consult with the excavation contractor on schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as an individual with a master's or doctorate degree in paleontology or geology and who is experienced with paleontological procedures and techniques; who is knowledgeable in the geology and paleontology of San Diego County; and who has worked as a paleontological mitigation project supervisor in the region for at least one year.</p> <p>The requirements for paleontological monitoring shall also be noted in the Paleontological Monitoring Plan to be prepared by the applicants and approved by the CPUC at minimum 30 days prior to construction beginning. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of a qualified paleontologist and shall be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits with high paleontological resource sensitivity (i.e., Torrey Sandstone Formation, old paralic deposits, and very old paralic deposits).</p> <p>In the event that fossils are encountered, the paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with the applicant's Cultural Resource Specialist, shall determine the significance of the discovered resources. The applicant's Cultural Resource Specialist and Environmental Project Manager will need to concur with the evaluation procedures to be performed before construction activities are be allowed to resume.</p>	<p>SDG&E and/or its contractors verify that a qualified CPUC approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by Paleontological the applicant <u>and/or its contractor(s)</u> is submitted 30 days prior to the beginning of construction work.</p> <p>The paleontologist will monitor construction-related <u>ground-disturbing</u> activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant's Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.</p> <p>At the conclusion of paleontological monitoring, the paleontologist prepares a monitoring report and verifies that SDG&E submits the report to the CPUC for review, approval, or request for changes.</p>	<p>Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols, relating to <u>cleaning, storage, cataloging and</u></p>	During construction	Entire project area	<u>SDG&E, CPUC</u>

Table 6-1 Draft Final Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
Small fossil remains may be present, and therefore a screen-washing operation may be set up onsite. If fossils are discovered, the paleontologist (or paleontological monitor) will recover them, along with pertinent stratigraphic data. The recovery of bulk sedimentary-matrix samples for offsite wet screening from specific strata may be necessary, as determined in the field. Any fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections. A final summary report will be completed that would outline the results of the recovery program. The report will discuss the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.					
<p>MM CUL-6: Treatment of Human Remains. The applicant will follow current legal requirements at the time of discovery for the treatment of human remains. At present, pursuant to Section 5097.98 of the California PRC and Section 7050.5(e) of the California State Health and Safety Code Section and PRC Section 5097.98, if human remains or bone remains of unknown origin are found at any time during project-related construction activities, all work shall stop in the vicinity of the find, and the San Diego County Coroner shall be contacted immediately.</p> <p>If the remains are determined to be Native American, the coroner shall notify the NAHC, who shall identify the person believed to be the MLD, who shall have at least 48 hours from notification of the find to comment. The landowner and MLD, with the assistance of the applicant and the archaeologist as requested, shall make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5(d)). If the MLD and the other parties do not agree on the reburial method, the requirements of PRC Section 5097.98(e) shall be implemented, which states that "...the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."</p>	CPUC verifies construction is halted if human remains are discovered and the County coroner is contacted.	Work is halted if human remains are discovered and County coroner is contacted	During construction	Entire project area	<u>SDG&E</u> , CPUC
GEOLOGY AND SOILS					
APM GEO-1. SDG&E will consider the recommendations and findings of a final geotechnical investigation and the contractor's Geotechnical Engineer regarding the potential for seismic activity, landslides, expansive soils, slope instability and differential settling. SDG&E will incorporate those recommendations, as appropriate, into the final design of the proposed project. The final proposed project design will be reviewed and approved by a	SDG&E submits final geotechnical study to CPUC prior to, and in support of, issuance of any permits necessary for project construction. Relevant geotechnical recommendations would be incorporated into final project design as feasible. <u>If identified as necessary based on the final geotechnical study, a geological monitor will monitor project activities occurring in geologically sensitive</u>	Final technical studies are required to support project approval decision and issuance of required permits.	Before construction	Entire project area or where deemed necessary in relation to the scope of specific geotechnical issues addressed in the final geotechnical investigation.	<u>SDG&E</u> , CPUC, (also Building Departments if those agencies will issue permits).

Table 6-1 Draft Final Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
Professional Engineer registered in the State of California prior to construction.	<u>areas within Torrey Pines State Natural Reserve Extension.</u>				
HAZARDS AND HAZARDOUS MATERIALS					
<p>MM HAZ-1: Hazardous Materials Waste Management Plan / Emergency Spill and Evacuation Training. Prior to construction, the applicant shall prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. The plan shall include the following requirements and procedures:</p> <p>1. The Worker Training Program (see MM BR-3) would include training requirements for construction workers, such as in appropriate work practices, including and spill prevention and response measures. Additional training for those performing excavation activities shall be required and shall include training on types of contamination and contaminants (e.g., petroleum hydrocarbons, asbestos, and hazardous materials as defined by the California HSC) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Training would also entail safe evacuation, which could be required due to an unanticipated major spill or other emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the affected work site and specified, approved evacuation route(s) in case of emergency. <u>This training may be carried out as a stand-alone training module or in conjunction with the training required in MM BR-3.</u></p> <p>2. Containment of all hazardous materials at work sites and properly dispose of all such materials.</p> <p>a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather and further contamination.</p> <p>b. Fuels and lubricants shall be stored only at designated staging areas.</p> <p>3. Maintenance of hazardous material spill kits for small spills at all active work sites and staging areas. Thoroughly clean all spills as soon as they occur. <u>If an accidental spill or fluid leak occurs at any point in time during project construction, including in locations within 50 feet of aquatic resources in unanticipated circumstances such as equipment malfunction, secondary containment strategies may be utilized to contain the spill.</u></p>	CPUC verifies that SDG&E and/or its contractors prepare a Hazardous Materials and Waste Management Plan and an employee training program that shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.	The Hazardous Materials and Waste Management Plan would include protocols addressing materials handling, contamination, contaminants, spill prevention, response measures as well as specific training for those performing excavation	Plan and evacuation training to be completed 30 days prior to commencement of construction. Measures in the plan shall be implemented during construction activities as necessary.	Entire project area	<u>SDG&E, CPUC</u>

Table 6-1 **Draft Final Mitigation Monitoring and Reporting Plan**

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
<p>4. Storing sorbent and barrier materials at all construction staging areas, including staging areas used during activities for decommissioning. Sorbent and barrier materials will be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials.</p> <p>5. Performing all routine equipment maintenance at a shop or at the staging area and recovering and disposing of wastes in an appropriate manner.</p> <p>6. Monitoring and removal of vehicles used for construction-related activities with chronic or continuous leaks from use and complete repairs before returning them to operation.</p> <p>7. Storing shovels and drums at the staging areas. If small quantities of soil become contaminated, shovels shall be used to collect the soil and store it in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material. Only trained construction workers shall handle hazardous, and potentially hazardous, materials.</p> <p>8. Transporting, shipping, and disposal procedures for hazardous waste.</p> <p>9. Identification of a qualified field environmental representative for the proposed project for management of hazardous materials, hazardous wastes, contaminated soil, and contaminated groundwater.</p> <p>10. Procedures for notifying applicant and agency personnel in the event of discovery of contaminated soil and/or groundwater. Contact information for federal, regional, and local agencies; the applicant's field environmental representative and environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers.</p> <p>This plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.</p>					

Table 6-1 **Draft Final Mitigation Monitoring and Reporting Plan**

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
NOISE					
<p>MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction:</p> <ul style="list-style-type: none">City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays). <p><u>In the event that project scheduling necessitates work outside of the hours permitted under local noise ordinances, SDG&E would meet and confer with the local jurisdictions, as needed, for guidance on scheduling and managing such construction noise in compliance with Article 9.4: Noise Abatement and Control, of the City of San Diego Municipal Code.</u></p>	CPUC will verify that project construction activities do not extend beyond 7 p.m. Monday through Saturday.	SDG&E and/or its contractors would schedule construction work in accordance with the timeframes permitted by City of San Diego and City of Del Mar construction noise ordinances.	During project construction	Entire project area	<u>SDG&E, CPUC, City of San Diego, City of Del Mar</u>
<p>MM NOI-2: Advance Notice of Construction. The applicant shall notify all sensitive receptors, including residences, within 50 feet of all project components at least 30 days prior to construction activities occurring in that area to provide opportunity to avoid the noise. The notice shall include dates, times, and description of construction activities. The applicant shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction.</p>	CPUC will verify that SDG&E has provided advance notice to sensitive receptors within 50 feet of project construction activities 30 days prior to the beginning of project construction.	Advance notification of construction activities provide opportunities to sensitive receptors to avoid construction noise.	At least 30 days prior to construction	Entire project area	SDG&E, CPUC
<p>MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance, <u>whichever is higher</u>. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:</p> <ul style="list-style-type: none">Temporarily and safely installing and maintaining absorptive noise control barriers in the perimeter of construction sites and/or between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.Limiting heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity.	CPUC will verify that SDG&E and/or its contractors will install noise control barriers (if feasible) and implement the noise reduction measures if the project contributes to increases of 10 dBA or more above ambient noise levels.	Measure would reduce construction noise levels to sensitive receptors through installation of noise barriers and other means.	Prior to and during construction	Entire project area	SDG&E, CPUC

Table 6-1 Draft Final Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
<ul style="list-style-type: none">• Ensuring that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition.• Maintaining construction equipment according to manufacturer recommendations.• Minimizing unnecessary construction equipment idling.• Reducing noise from back-up alarms (i.e., alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimize the need for back-up alarms. Use flagmen to minimize the time needed to back up vehicles.• When possible, using construction equipment specifically designed for low noise emissions, such as equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines.• Where practical, locating stationary equipment such as compressors and generators away from sensitive receptors.					

Table 6-1 **Draft Final Mitigation Monitoring and Reporting Plan**

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
PUBLIC SERVICES					
<p>APM PS-01. No less than 60 days prior to beginning construction, SDG&E will coordinate with schools (or the appropriate school district) that are located within 250 feet of proposed project activities. These schools include the following:</p> <ul style="list-style-type: none">• Therapeutic Learning Center• Del Mar Hills Elementary School• Del Mar Hills Nursery School• Brighter Future Preschool and Child Development Center• Del Mar Heights Elementary School <p>SDG&E and the schools (or school district) will determine the best time to conduct construction activities that have the potential to impact schools in an effort to avoid major school events and to minimize any disruption to learning. Where feasible, SDG&E will conduct construction activities outside of the scheduled school year, during seasonal breaks, outside of peak drop-off and pick-up hours for the standard school day, at night, or during weekends to reduce potential impacts to local schools.</p>	CPUC to verify that SDG&E and/or its contractors has contacted the appropriate personnel at the facilities where construction would occur within 250 feet at least 60 days prior to the beginning of construction.	SDG&E and/or its contractors to provide advanced notice of construction activities that would occur within 250 feet of schools and educational facilities so that any potential disruptions may be addressed through planning or program adjustments.	Sixty days before construction	Schools and educational facilities stated in APM PS-01 within 250 feet of project construction activities.	SDG&E and/or its contractors, <u>CPUC</u>
RECREATION					
<p>APM REC-01. SDG&E will post signage at access points to recreational facilities that may be subject to access restrictions due to the proposed project no less than four weeks prior to the beginning of construction activities within or adjacent to the facilities. These facilities will include Torrey Pines State Natural Reserve, Torrey Pines State Beach, Del Mar Horsepark, and Sorrento Valley Pedestrian/Multi-Use Path. This signage will notify users of the impending construction activities; construction impacts (e.g., increased noise and dust); the affected locations; and the estimated duration of any necessary temporary closures or access restrictions. Contact information for the proposed project's public liaison will be provided on the signage, and the public liaison will address any complaints related to dust, noise, and access restrictions.</p>	CPUC to verify that SDG&E and/or its contractors posts signage at access points to recreational facilities that may be subject to access restrictions no less than four weeks prior to the beginning of construction activities within or adjacent to the affected facilities. has contacted the appropriate personnel at the facilities where construction would occur within 250 feet at least 60 days prior to the beginning of construction.	Access restrictions are intended to ensure public safety and protect facilities users from impacts during construction activities.	Four weeks prior to the beginning of construction.	Torrey Pines State Natural Reserve; Torrey Pines State Beach; Del Mar Horsepark; and Sorrento Valley Pedestrian/Multi-Use Path	SDG&E, and respective facilities managers of affected recreational facilities.
APM REC-02. Authorities representing facilities where access restrictions may occur (i.e., the California Department of Parks and Recreation and the City of San Diego) will be contacted and given advance notice of project activities no less than eight weeks prior to construction. 22nd District Agricultural Association that manages and operates the Del Mar Horse Park no less than eight weeks prior. Authorities for recreational facilities that may be subject to access restrictions (i.e., the California Department of Parks and Recreation and the City of San Diego) will be directly contacted and given advance notice of proposed project activities	CPUC verifies that SDG&E and/or its contractors inform appropriate authorities of advance access restrictions	Access restrictions are intended to ensure public safety and protect facilities users from impacts during construction activities.	Between one and two months <u>Eight weeks</u> in advance of construction.	Del Mar Horsepark	<u>SDG&E, CPUC, 22nd District Agricultural Association, and California Department of Parks and Recreation, and City of San Diego Department of Parks and Recreation representatives</u>

Table 6-1 Draft Final Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
no less than four <u>eight</u> weeks prior to construction. SDG&E will also coordinate with the 22nd District Agricultural Association that manages and operates the Del Mar Horsepark at least four <u>eight</u> weeks prior to construction to minimize potential impacts to the facility and its users during construction.					
MM REC-1: Documentation of Conditions. The applicant shall photograph pre-project conditions at the Torrey Pines and Del Mar Heights Fly Yards from multiple viewpoints to adequately represent pre-construction conditions at both sites. The applicant shall submit a portfolio of these images to CPUC staff and to appropriate representatives of Del Mar Heights School and Torrey Pines State Beach prior to the use of either facility for construction-related purposes. Upon completion of project construction, the applicant shall restore the fly yard sites to pre-project conditions and submit a portfolio of “before and after” photographs documenting physical conditions of each site, as applicable. The portfolio of images shall be submitted to the CPUC and to designated agents on behalf of Del Mar Heights School and Torrey Pines State Beach <u>parking facility</u> to ensure that the affected facilities are returned in satisfactory condition.	CPUC verifies that SDG&E and/or its contractors repairs to pre-project conditions any roads or facility surfaces damaged by project vehicle traffic, and photographs are taken both pre- and post-construction to document roadway and pavement changes resulting from project construction.	Any roads or surfaces damaged by project vehicle traffic are restored post-construction to the conditions documented prior to project construction, and photographs are taken of roadways and pavement conditions pre- and post-construction effectively document all past and existing conditions.	Prior to construction – document pre-project conditions Post-construction – restore damaged roads and surfaces and document restoration	Roadways and surfaces at the Del Mar and Torrey Pines Fly Yards.	SDG&E, CPUC, <u>California Department of Parks and Recreation, and City of San Diego Department of Parks and Recreation representatives</u>
TRANSPORTATION AND TRAFFIC					
APM TRA-01. At least 30 days prior to construction of the proposed project, SDG&E will coordinate with the Del Mar Fire Department and the San Diego County Sherriff’s Department to inform them of the planned lane closures along Jimmy Durante Boulevard and to minimize potential disruptions to emergency vehicle response times.	CPUC verifies that SDG&E and/or its contractors notify all local emergency service providers serving the project area at least one month prior to the planned lane closure(s). SDG&E and/or its contractors will establish provisions to maintain emergency vehicle access at all times throughout construction, including lane closures.	Emergency service providers are notified of lane closures at least one month prior to the closure, and emergency vehicles have access to roads and emergency routes at all times throughout construction.	Prior to construction – notify local emergency providers of lane closures During construction – continue to notify local emergency services of lane closures at least one month prior to each closure, and maintain emergency vehicle access throughout the project.	Entire project area	<u>SDG&E, CPUC, Del Mar Fire Department, San Diego County Sherriff’s Department</u>

Table 6-1 Draft Final Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring/Reporting Action	Effectiveness Criteria	Timing	Location	Responsible Agencies and Parties
APM TRA-02. At least 30 days prior to construction, SDG&E will coordinate with the North County Transit District on the planned construction activities, including the timing and duration of construction in the vicinity of existing bus stops along Via De La Valle. This coordination will include the identification of potential temporary relocation of bus stops in order to maintain service during construction. At least 10 days prior to the bus stop closure, SDG&E will post signs near any affected bus stops to notify bus riders of any potential modifications the standard bus schedule, alternate stops in the area, and a phone number to call to obtain more information.	CPUC verifies that SDG&E and/or its contractors coordinates with local transit agencies to temporarily relocate transit routes and/or bus stops in work zones.	Traffic routes and bus stops are routed to avoid conflicts with work zones during construction.	During construction	Entire project area	<u>SDG&E, CPUC, North County Transit District</u>

Key:
APM applicant proposed measure
BMP best management practice
CPUC California Public Utilities Commission
DPR California Department of Parks and Recreation
EPA U.S. Environmental Protection Agency
MM mitigation measure
NAHC Native American Heritage Commission
NEIC Northeast Information Center
PRC Public Resources Code
SCAQMD South Coast Air Management District
SWPPP Stormwater Pollution Prevention Plan
SWRCB State Water Resources Control Board

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7.0 Responses to Comments

On December 6, 2018, the California Public Utilities Commission (CPUC) circulated a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for San Diego Gas and Electric Company's (SDG&E's, or the applicant's) Permit to Construct (PTC) the TL674A Reconfiguration and TL666D Removal Project (proposed project) (Application A.17-06-029) to the public and public agencies pursuant to the California Environmental Quality Act (CEQA), Section 15072. The CPUC sent the NOI to the County of San Diego, 859 property owners, 17 tribes, and other interested parties. The Draft Initial Study (IS)/MND was also announced in the *San Diego Union Tribune* newspaper on December 6, 2018. The CPUC posted the Draft IS/MND on its website and made electronic and hard copies of the document available at the San Diego County Public Library's Central and Del Mar branches. The IS/MND is available online at <http://www.cpuc.ca.gov/environment/info/ene/delmar/delmar.html>.

During the public review period for the Draft IS/MND, the CPUC received comments from public agencies and the applicant. Table 7-1 lists the persons and agencies that submitted comments on the Draft IS/MND. If revisions were made to the Draft IS/MND, they are provided with the response to the specific comment. Revisions are indicated in the text of this Final MND with ~~strikeout~~ for deletions of text and in underline for new text.

Table 7-1 Index of Commenters and Responses

Commenter	Affiliation	Type	Date of Comment	Response Code
Public Agencies				
Darren Smith, Services Manager	California State Parks, San Diego Coast District	Letter	01/07/2019	A-1 – A-8
Cindy Kimmel	California State Parks, San Diego Coast District	Email	12/19/2018	B-1
Jacob Armstrong, Branch Chief	California Department of Transportation	Letter	01/07/2019	C-1 – C-10
Native American Tribes				
Ray Teran, Resource Management	Viejas Band of Kumeyaay Indians	Letter	12/10/2018	D-1 – D-2
Applicant				
Elizabeth A. Cason, Senior Counsel	San Diego Gas & Electric	Letter	01/07/2019	E-1 – E-87
Individuals				
Andrew Kahng	Self	Email	12/15/2018	F-1
Betty Hertel	Self	Email	12/10/2018	G-1 – G-2
Kevin Patrick	Self	Email	12/11/2018	H-1 – H-2
Maali Mohsen	Self	Email	12/26/2018	I-1

Public Agencies

Comment Letter A

California State Parks, San Diego Coast District



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION
San Diego Coast District
4477 Pacific Highway
San Diego, CA 92110
(619) 688-3260 FAX (619) 688-3229

Lisa Ann L. Mangat, Director

January 7, 2019

TL674A Reconfiguration and TL666D Removal Project
c/o Ecology and Environment, Inc.
Attn: Silvia Yanez, Project Manager
505 Sansome Street, Suite 300
San Francisco, CA 94111

Fax: (415) 398-5326
Email: TL674A.CPUC@ene.com

Re: TL674A Reconfiguration and TL666D Removal Project

Dear Ms. Yanez,

Thank you for the opportunity to comment on the Draft IS/MND for proposed TL674A Reconfiguration and TL666D Removal Project (Project). A portion of this project occurs within Torrey Pines State Natural Reserve (TPSNR) including the removal of Poles 71-77 and 82-89 and a proposed lay down area within the North Beach Day Use Lot. California State Parks (CSP) is a public trust agency that owns and operates TPSNR. SDG&E/CPUC has a number of transmission lines and associated easements within CSP property. CSP has long sought to reduce the impacts of public utility infrastructure within TPSNR by removing or relocating utility lines within sensitive habitats and public use areas. SDG&E/CPUC has been a good neighbor and partner in previous maintenance and relocation projects at TPSNR and we support this project. Several issues need to be addressed or resolved before the Final IS/MND is certified and the Project is implemented: review of State Park plans, policies, and regulations, biological monitoring and coordination with State Parks staff, protection of geological resources, use of the North Beach Lot for lay down area, and issuance of a Right-of-Entry Permit.

A-1

While the Draft IS/MND reviews other Federal, State, and local laws, policies, and ordinances, the DRAFT IS/MND does not discuss or provide analysis of the CSP's planning documents, regulations or policies. These documents provide guidance and legal framework for projects at TPSNR and California State Parks in general. (for example Torrey Pines General Plan http://www.parks.ca.gov/pages/21299/files/ar_630_1569.pdf; Department Operations Manual Chapters 300 (Natural Resources); 400 (Cultural Resources), 500 (Park Planning), The Los Penasquitos Lagoon Enhancement Plan Update <http://www.lospenasquitos.org/wp-content/uploads/2017/05/LosPenEnhancementPlan-Aug2016.pdf>, and others. TPSNR has been included as part of the City of San Diego's Multiple Species Conservation Program Multiple Habitat Preserve Area and this program is generally consistent with State Parks natural resource plans and policies. The Final IS/MND should include a brief discussion of State Park policies and regulations and their consistency with the findings of the DRAFT IS/MND.

A-2

A-3

The proposed Draft IS/MND prescribes biological and cultural resources monitoring programs in the mitigation and monitoring plan. Because of the sensitivity of the habitats within close proximity to the Project and the narrow workspaces, we strongly recommend adding to the

A-4

mitigation and monitoring plan additional the biological monitoring onsite for all work in upland habitats (including trails and bare areas) at TPSNR. For the wetland habitats we support SDG&E's use of a helicopter to minimize impacts while working in sensitive areas with difficult access. We understand the safety constraints with using a helicopter and would recommend always having a biological monitor in communication with technicians. This should include before and at the end of each day's work and collecting before and after pictures for each pole after each day's work. All biological monitoring work will need to be coordinated with the State Environmental Scientist.

Cont.
A-4

A cultural resources monitor will need to be onsite for all work within or near sensitive cultural sites and features. A cultural resource permit will be required for any cultural resources monitoring within TPSNR. This permit will require a lead-time of four weeks before work can begin. All biological monitoring work will need to be coordinated with the State Archaeologist.

A-5

Although there are no expected impacts to geologic features mentioned in the Draft MND/IS, there are several poles in the south end of the TPSNR Extension (Red Ridge) that are located on significant geologic features along Red Ridge in the TPSNR Extension. For the Red Ridge area, CSP recommends adding geologic resources monitoring to the Mitigation and Monitoring plan and providing either a cultural or biological monitor to avoid any work that would impact geologic resources.

A-6

The Draft MND/IS proposes using a large area of the North Beach Day Use lot at TPSNR for a lay down area. The configuration, timing and size of the area will have to be coordinated to minimize coastal access impacts and disruption to State Park visitors and operations. Additionally, a private contractor operates the lot's fee collection and use of a lay down area may require reimbursement to recover their revenue for reduced parking spaces.

A-7

Because access to the North Beach lot and other access points or paths are outside the SDG&E easement, a Right of Entry Permit (ROE) will need to be issued by CSP. The ROE will specify the State's requirements for temporary use of the land and will specify a consideration for the ROE. The ROE will need a lead-time of approximately four weeks before work can begin.

A-8

Thank you for providing the opportunity to comment on the Draft IS/MND. CSP looks forward to working with you on this project. Please call me at (619) 952-3895 if you have any questions or need any information.

Sincerely,



Darren Smith, District Services Manager, San Diego Coast District, California State Parks

Cc.

Lisa Urbach, North Sector Superintendent
Kimberly Weinstein, Administrative Chief
Dylan Hardenbrook, Senior Supervising Ranger
Susan Kosek-Kelly, Maintenance Chief III
Georgia Schneider, Maintenance Chief I
Cara Stafford, District Environmental Scientist
Nicole Turner, District Archaeologist
Cindy Krimmel, District Environmental Planner
Mike Hastings, Los Penasquitos Lagoon Foundation
Reading File

Responses to Comment Letter A California State Parks, San Diego Coast District

A-1 The commenter describes the issues that the State of California Department of Parks and Recreation (Cal Parks) request be addressed in the Final IS/MND. The commenter states that the issues that will be discussed in greater detail in their comment letter pertain to including an adequate review of State Park plans, policies, and regulations; biological monitoring and coordination with State Parks staff; protection of geological resources; use of the North Beach Lot as a laydown yard; and issuance of a Right-of-Entry Permit.

The CPUC appreciates Cal Parks' involvement in the proposed project, components of which would cross Cal Parks land. The CPUC has responded to Cal Parks' comments individually, as discussed in detail below. Furthermore, on January 18, 2019, the CPUC submitted a formal letter to Cal Parks requesting clarification of a comment from Cal Parks' original comment letter on the Draft IS/MND. On February 6, 2019, the CPUC submitted a follow-up email to Cal Parks, reiterating the clarification request. Cal Parks did not respond to the CPUC letter or email. The CPUC has therefore responded to the Cal Parks letter to the best of their capacity, given the understanding of the proposed project and present conditions at the Cal Parks facilities that would be crossed by the proposed project.

A-2 The commenter requests that in the Final IS/MND, the CPUC provides an analysis of project compatibility with Cal Parks' planning documents, regulations, and policies, including the San Diego Coastal State Park System General Plan: Torrey Pines State Beach and State Reserve, the California Department of Parks and Recreation Department Operations Manual, and the Los Peñasquitos Lagoon Enhancement Plan Update. Appendix G, "Land Use Policy Matrix" of the Draft IS/MND, did not include a compatibility analysis of these three planning documents.

Revisions to the Draft IS/MND in response to this comment have been made to Appendix G, "Land Use Policy Matrix". Please refer to Appendix G to review applicable updates. While a consistency analysis of policies from the Los Peñasquitos Lagoon Enhancement Plan Update was not incorporated into Appendix G because the plan is currently in a draft stage, a brief summary of the overall intent of the document and its consistency with the proposed project has been provided. Chapter 300: Natural Resources from the State of California Department of Parks and Recreation Department Operations Manual was also summarized and evaluated in Appendix G for overall consistency of the proposed project with described policies. Overall, the proposed project is not expected to conflict with existing plans and policies pertaining to California State Parks. Additionally, **APM REC-01** and **APM REC-02** require that SDG&E coordinate with California State Parks prior to the start of project-related activities within California State Parks land; this would ensure that project activities do not conflict with such plans.

A-3 The commenter requests that the Final IS/MND include a brief discussion of State Park policies and regulations and their consistency with the findings of the Draft IS/MND.

As described in the response to Comment A-2, a brief discussion of State Park policies and regulations and their consistency with the findings of the Draft IS/MND has been included in Appendix G, "Land Use Policy Matrix", which has been updated for the Final IS/MND.

A-4 The commenter notes that the Draft IS/MND prescribes biological and cultural resources monitoring programs in Chapter 6.0, "Mitigation Monitoring and Reporting Plan (MMRP)," and requests that the plan clarify that additional onsite biological monitoring will be incorporated into the MMRP for all work in upland habitats, including trails and bare areas, at Torrey Pines State Natural Reserve. The commenter also states that Cal Parks supports the biological monitoring strategies for sensitive wetland habitat areas as described in Chapter 6.0 and Section 5.4, "Biological Resources" of the Draft IS/MND. However, the commenter requests that in instances in which a biological monitor must observe project activities from outside of the sensitive wetland habitat areas, the monitor should have the means to maintain communication with pole removal technicians, both before and after each workday. Furthermore, the commenter states that biological monitoring work must be coordinated with the Cal Parks State Environmental Scientist.

As described in the response to Comment A-1, the CPUC submitted a formal clarification request letter to Cal Parks on January 18, 2019. This letter requested clarification that Cal Parks' request for biological monitoring in upland habitats, including trails and bare areas, refers to the upland areas at Torrey Pines State Natural Reserve Extension, not the wetland lagoon habitat within Torrey Pines State Natural Reserve. The CPUC requested this clarification because the wetland lagoon habitat within Torrey Pines State Natural Reserve supports no upland habitat areas within the project area. A Contact Report documenting this correspondence, as well as copies of all correspondences between CPUC and Cal Parks, is included as Appendix K to the Final IS/MND.

The commenter notes that the portions of the proposed project that span Torrey Pines State Natural Reserve include Poles 71–77, and Poles 82–89. The Draft IS/MND identifies Poles 71–77 as spanning Torrey Pines State Natural Reserve Extension, and Poles 82–89 as spanning Torrey Pines State Natural Reserve. Based on the CPUC's evaluation of the San Diego Coastal State Park System General Plan: Torrey Pine State Beach and Reserve (Cal Parks 1984) (see Comment A-2), the CPUC has noted that Cal Parks defines Torrey Pines State Natural Reserve as a facility supporting "1,256 acres (502 hectares) of coastal terrace, bluffs, coastal wetlands, and floodplain. Included in the reserve are 183 acres (74 hectares) of rugged ridges and canyons, commonly referred to as the 'Extension,' which is separated from the rest of the unit by private development. North Torrey Pines Road, a mostly four-lane portion of Highway 101, divides both the state beach and state reserve" (Cal Parks 1984).

Due to the distinct environmental conditions between the wetland lagoon environment within Torrey Pines State Natural Reserve and the upland bluff areas within Torrey Pines State Natural Reserve Extension, the CPUC identified these two disjointed branches of the state park as separate facilities with distinct monitoring needs, as discussed in detail in Section 5.4, “Biological Resources.” The mitigation strategies described in Chapter 5.4, “Biological Resources” and Chapter 6.0, “Mitigation, Monitoring, and Reporting Plan” of the Draft IS/MND are intended to ensure that effective biological monitoring occurs from outside of sensitive wetland areas to ensure that the biological monitor’s presence does not cause additional impacts to biological resources. Otherwise, biological monitors shall be present where appropriate within all upland work areas in which the presence of a biological monitor would not threaten additional impacts to biological resources. To clarify that the monitoring strategy presented in the Draft IS/MND is consistent with Cal Parks’ requests, **MM BR-4: Construction Monitoring** has been revised in both Section 5.4 and Chapter 6.0 MMRP, as follows:

“MM BR-4: Construction Monitoring. The applicant shall ensure that a qualified, CPUC-approved biological monitor is present at all times to monitor ground-disturbing activities (e.g., grading, vegetation removal, trenching, digging, etc.) in areas that have the potential to support special status species. All ground-disturbing activities that would occur within 50 feet of Environmentally Sensitive Areas (areas supporting special status species, sensitive natural communities, and aquatic features), ESHAs, and all potentially jurisdictional aquatic features (non-wetland waters of the state, wetlands, streambeds, open water, tidal waters, and jurisdictional natural communities) will be monitored. To minimize the potential for human-related impacts in sensitive areas and to maintain worker safety, a biological monitor shall not be present to observe project activities within helicopter access-only work areas in San Dieguito Lagoon or Los Peñasquitos Lagoon. The CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. When the CPUC-approved biological monitor must observe project activities from a safe distance, the monitor will maintain communication with pole removal technicians, both before and after each workday, to ensure that appropriate biological resource protection protocols are implemented. In work areas located outside of the lagoons, including upland habitat within Torrey Pines State Natural Reserve Extension, and in work areas ~~or~~ within the lagoons ~~by~~ but fully accessible by foot, the CPUC-approved biological monitor shall be present to observe project activities as described above. Areas within existing pavement that do not have the potential to support special status species will receive a pre-construction survey and spot-checks, as determined by the biological monitor in accordance with SDG&E’s NCCP. The biological monitor shall have temporary stop-work authority if he or she determines that project-related activities present a threat to sensitive biological resources. If the biological monitor must stop work due to threat to a biological resource, work may resume once the biological monitor determines that activities will no longer risk or endanger the resource, or upon further consultation with the appropriate agencies (CDFW, USFWS, USACE, RWQCB, or CCC).”

To ensure that pole removal plans and scheduling is compatible with Cal Parks' needs, SDG&E would coordinate with Cal Parks regarding planned pole removal dates and activities within Cal Parks' lands, including coordinating project work with the State Environmental Scientist. **APM REC-02** requires that SDG&E contact authorities of facilities that may experience access restrictions, including California State Parks facilities, no fewer than eight weeks prior to construction. **APM REC-02** therefore ensures that coordination between SDG&E and California State Parks authorities occurs prior to the start of project construction, including coordination with the State Environmental Scientist, as needed.

A-5 The commenter states that a cultural resources monitor would be required onsite for all project work conducted within or near sensitive cultural sites and features. Additionally, the commenter states that a cultural resource permit would be required for any cultural resources monitoring within Torrey Pines State Natural Reserve. For consistency with Comment A-4, the CPUC has interpreted this to refer to all cultural resources monitoring within the Torrey Pines State Natural Resources Reserve and Torrey Pines State Natural Resources Reserve Extension.

To clarify permitting needs associated with conducting archaeological investigations on California State Parks lands, and to accommodate additional revisions made in response to Comment E-76, and Native American involvement requests discussed in greater detail in response to Comment D-2, **MM CUL-2** has been revised as follows.

"MM CUL-2: Cultural Resources Monitoring. The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project's qualified archaeological monitor.

A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project via a Cultural Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days prior to the start of project activities. The Cultural Resources Monitoring Plan shall include, at minimum, information regarding the location of project work areas/sites requiring cultural resources monitoring, how monitoring will be conducted, and the respective roles and responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified archaeologist. Responsibilities for the CPUC-approved archaeologicalst monitor shall include cultural resources monitoring and implementing stop-work authority in the event of an unanticipated cultural resources discovery during project activities. Responsibilities of the SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to recommence project activities after a stop-work order has been installed to protect potential cultural resources, analysis and curation of materials, and preparation of a report detailing the results of monitoring activities results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified

archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.

Where cultural resources monitoring is needed at project work areas/sites within California State Parks lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.”

A-6 The commenter asserts that while no impacts to geologic features are expected as part of the proposed project, the CPUC should consider incorporating a geologic resources monitor into appropriate MMRP measures to ensure that potential impacts are minimized at the geologic features along Red Ridge within Torrey Pines State Natural Reserve Extension.

The analysis presented in Section 5.6, “Geology and Soils,” of the Draft IS/MND does not identify the potential for any significant project-related impacts to geology and soils. However, **APM GEO-1** would ensure that SDG&E will consider the recommendations and findings of a final geotechnical investigation regarding potential concerns about soil instability, landslides, and other geologic hazards. If the final geotechnical investigation identifies a need for supplemental mitigation and/or monitoring protocols associated with the Red Ridge features within Torrey Pines State Natural Reserve Extension, SDG&E would be obligated to consider those recommendations and implement a geological monitoring protocol as needed.

To ensure that a geological monitor is incorporated if needed based on the findings of the final geotechnical investigation required per **APM GEO-1**, the “Monitoring/Reporting Action” column on Draft IS/MND page 6-15 has been revised as follows:

“SDG&E submits final geotechnical study to CPUC prior to, and in support of, issuance of any permits necessary for project construction. Relevant geotechnical recommendations would be incorporated into final project design as feasible. If identified as necessary based on the final geotechnical study, a geological monitor will monitor project activities occurring in geologically sensitive areas within Torrey Pines State Natural Reserve Extension.”

A-7 The commenter notes that the timing and exact dimensions of the proposed laydown yard within the Torrey Pines State Natural Reserve North Beach Day Use Lot would be required to be coordinated with Torrey Pines State Natural Reserve to minimize coastal access impacts and disruption to State Park visitors and operations personnel. Additionally, the commenter notes that because a private contractor manages parking fee collection at the North Beach Day Use Lot, the private contractor may separately request reimbursement to recover the lost revenues resulting from reduced parking spaces.

As discussed in response to Comment A-4, SDG&E would coordinate with Cal Parks regarding planned project activities. This coordination would address facility access, such as North Beach Day Use Lot access for both a laydown yard and project activities. SDG&E would coordinate with the parking lot fee collection contractor to ensure that required dues are paid for leasing the lot space for the laydown yard. **APM REC-02** requires that SDG&E contact authorities of facilities that may experience access restrictions, including California State Parks facilities, no fewer than eight weeks prior to construction. **APM REC-02** therefore ensures that coordination between SDG&E and California State Parks authorities occurs prior to the start of project construction, including coordination regarding North Beach Day Use Lot facility use and compensation fees, as needed.

A-8 The commenter notes that because access to the North Beach Day Use Lot and other access points or paths is outside of SDG&E's existing easement, Cal Parks would be required to issue a Right of Entry (ROE) Permit to SDG&E for proposed project activities. The ROE would specify temporary land use requirements and ROE considerations. It would take approximately four weeks for SDG&E to obtain the ROE from Cal Parks.

As discussed in response to Comment A-4, **APM REC-02** would ensure that SDG&E coordinate with Cal Parks regarding planned project activities at least eight weeks prior to the start of project construction. This ensures that SDG&E would contact Cal Parks with adequate time to obtain the ROE permit.

Comment Letter B
California State Parks, San Diego Coast District

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Wednesday, December 19, 2018 3:44 PM
To: Yanez, Silvia A.
Subject: FW: TL674A Project

Follow Up Flag: Flag for follow up
Flag Status: Completed

From: Krimmel, Cindy@Parks
Sent: Wednesday, December 19, 2018 3:41:37 PM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: TL674A Project

Please add my name or email to your mailing list for this project:

Cindy Krimmel
San Diego Coast District, California State Parks
4477 Pacific Highway
San Diego, Ca 92110

Cindy.krimmel@parks.ca.gov

Thank you,

Cindy Krimmel
Environmental Planner (619) 278-3771
San Diego Coast District, California State Parks

B-1

Responses to Comment Letter B
California State Parks, San Diego Coast District

B-1 The commenter requests to be added to the email and mailing list for the proposed project.

The commenter has been added to the proposed project's mailing list.

Comment Letter C California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

January 7, 2019

11-SD-5

PM VAR

TL674A Reconfiguration and TL666D Removal Project
SCH#2018121014

Mr. John Forsythe
California Public Utilities Commission
300 Capitol Mall, Suite 418
Sacramento, CA 95814

Dear Mr. Forsythe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the TL674A Reconfiguration and TL666D Removal Project located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Hydrology and Drainage Studies

Please see attached the drainage as-builts for the Via de la Valle work in the Caltrans Right-of-Way (R/W) (Appendix J Map 2 of 13 in the IS-MND Report.) The typical trench section for the 69-kV Duct Bank (pg. 4-14) shows the depth as "Per Spec." Please review the attached drainage culvert as-builts to determine how close the proposed work is to the cross culverts under Via de la Valle.

C-1

Noise and Hazardous Waste and Air

A health and safety plan for lead and asbestos, PCB, prepared by a Certified Industrial Hygienist (CIH) shall be provided by the contractor, including items in 8 CA of Regs \$1532.1. It shall be implemented for all workers handling the soil, asbestos containing material, PCB within the R/W and dispose of them in accordance with all applicable environmental regulations.

C-2

If any import borrow takes place, it shall be obtained from an established commercial source (and defined as "Clean Soil") or has a total lead concentration at or below 80mg/kg.

C-3

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January 7, 2019
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Electrical System

Please see the attached As Builts for the existing Caltrans' Electrical System at Via De La Valle. The attached As Builts may not cover all existing electrical facilities. Because of this the Contractor will need to reference the Subsurface Locator as a work item prior to excavating in Via De La Valle to identify the existing Caltrans' underground facilities.

C-4

Please also contact the Caltrans Electrical Maintenance staff prior to work on this project.

Traffic Control Plan/Hauling

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway System. Additional information is provided online at:
<http://www.dot.ca.gov/trafficops/permits/index.html>

C-5

A Traffic Control Plan will need to be submitted to Caltrans District 11, including the interchanges at Interstate 5/Via de la Valle, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (Interstate 5) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

C-6

Right-of-Way

The ongoing Caltrans I-5 North Coast Corridor (I-5 NCC) project along I-5 is in the area of this projects. Any work near the construction zone may require coordination with the Caltrans construction contractor.

C-7

California Public Utilities Commission shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-5 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

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Mr. John Forsythe
January 7, 2019
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The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

C-8

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies. Please highlights the following that occur within the Caltrans' R/W: specific environmental impacts (depth of trench), mitigation elements that could impact, and any resource agency permits that would be required.

C-9

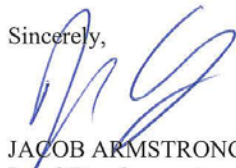
Please see Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/trafficops/ep/manual.html>

C-10

Please see Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/design/cadd/manuals/ppm.html>

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Local Development and Intergovernmental Review Branch

Attachments:
Appendix J: Detailed Project Components Maps
As-Built for Existing Caltrans' Electrical System at Via De La Valle

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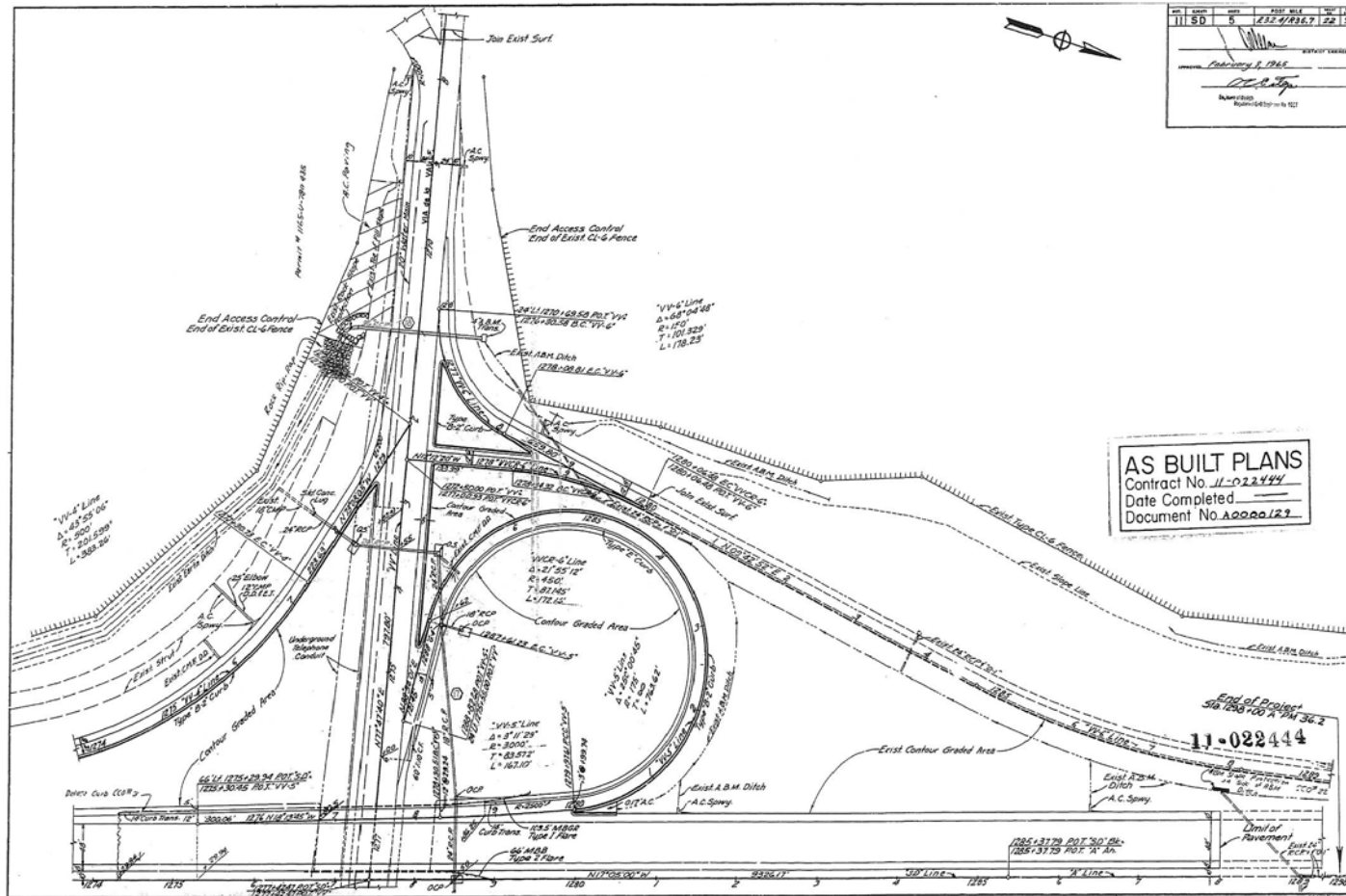
Appendix J
Detailed Project Components Maps

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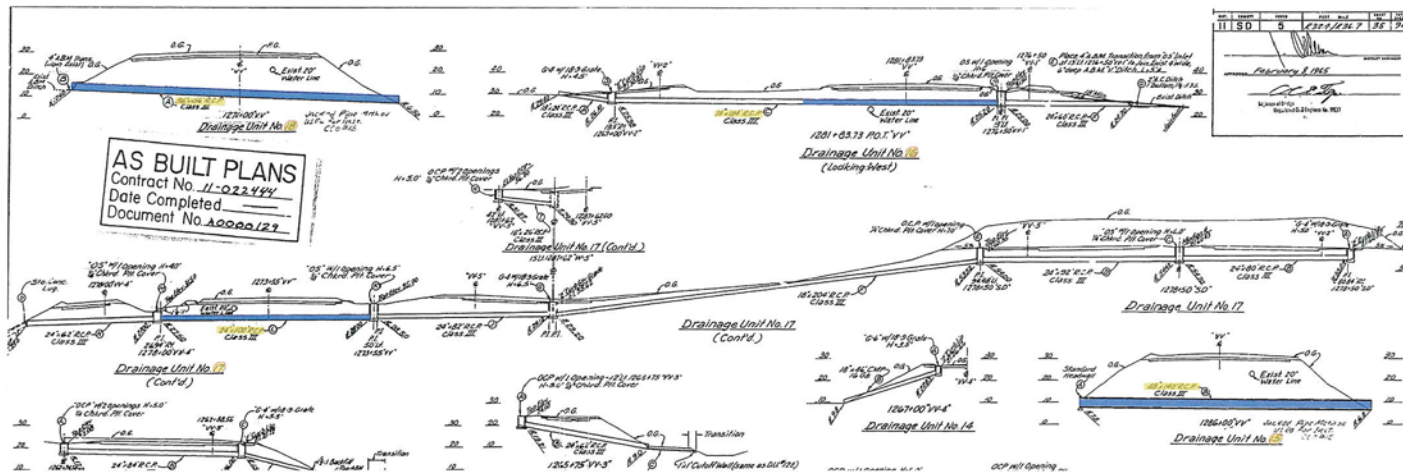
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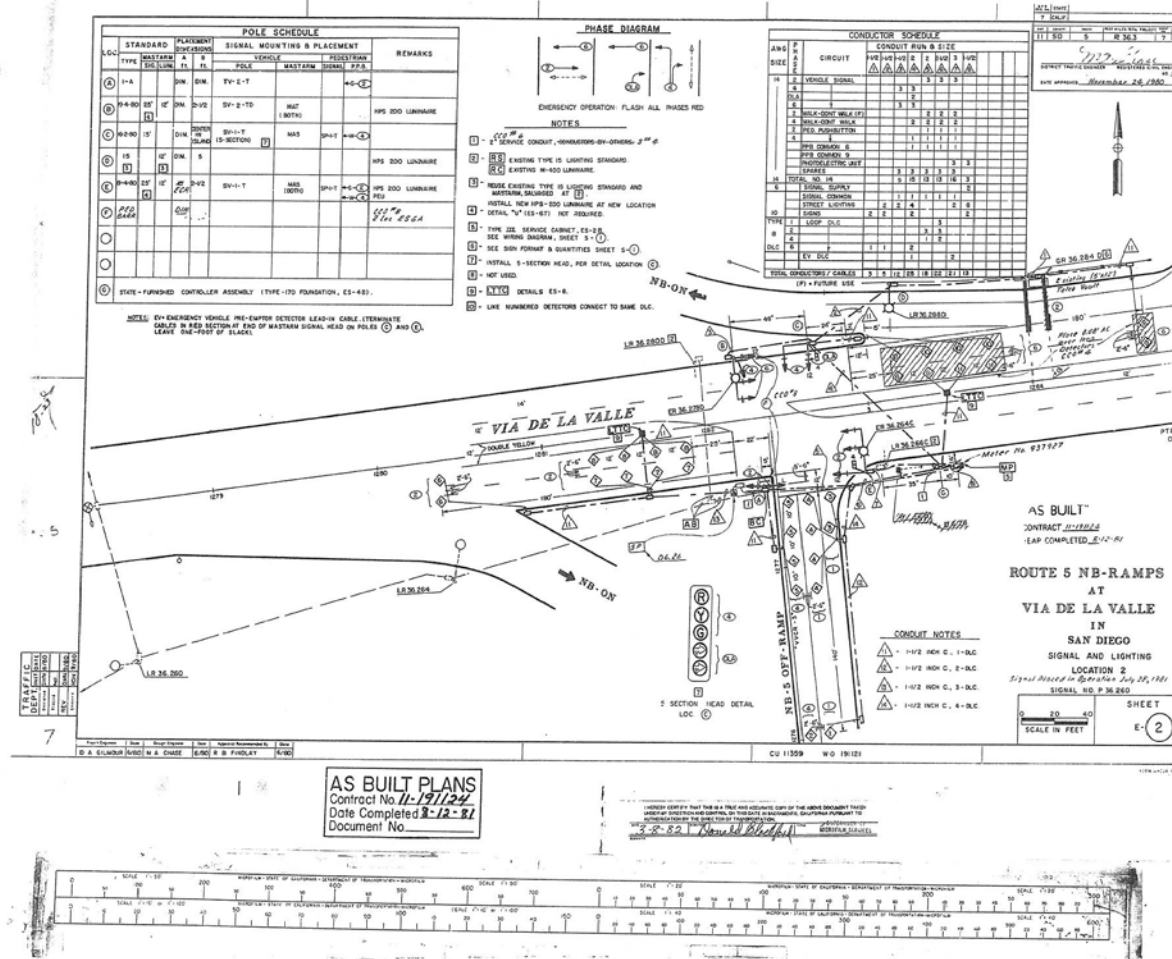
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Response to Comment Letter C California Department of Transportation

C-1 The commenter requests that the applicant review attached drainage as-built drawings for the Via de la Valle work in the California Department of Transportation (Caltrans) right-of-way (ROW) to determine the proximity of the proposed work to the cross culverts under Via de la Valle.

The letter containing the attached drainage as-built drawings has been forwarded to the applicant. These drawings would be considered when determining how close the proposed work would be to the cross culverts under Via de la Valle during the final engineering design phase of the project.

C-2 The commenter requests that a health and safety plan for lead, asbestos, and polychlorinated biphenyls (PCBs), prepared by a Certified Industrial Hygienist, be provided by the contractor, including items in 8 California Code of Regulations §1532.1. The health and safety plan would be implemented for all workers handling soil, asbestos-containing material, and PCBs within the ROW, and would direct workers to dispose of them in accordance with all applicable regulations.

Section 5.8 discusses hazards and hazardous materials. According to the applicant, management practices documented in SDG&E's "Best Management Practices Manual for Water Quality Construction," (BMP Manual; Appendix F) would be implemented during construction to reduce potential impacts from hazardous materials.

In addition to implementing BMPs, the applicant would comply with all applicable regulations pertaining to the management of hazardous materials and hazardous wastes. Removal or relocation of utility lines with components suspected to contain asbestos may require notification to the San Diego Air Pollution Control District (SDAPCD), an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M). The CPUC expects the applicant to adhere to all applicable laws and regulations, implement the applicant's BMP Manual, and conduct Safety and Environmental Awareness Program training. Furthermore, **MM HAZ-1** requires the applicant to prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. Refer to Draft IS/MND pages 5.8-18 and 5.8-19 to see the full mitigation measure.

C-3 The commenter requests that if any import borrow takes place, it shall be obtained from an established commercial source (and defined as "Clean Soil") or have a total lead concentration at or below 80 milligrams per kilogram.

As part of the proposed project, the applicant proposes to backfill holes and trenches with excavated soils as necessary. Should contaminated soil be encountered during trenching activities, the applicant would sample in place, test, profile, and transport the material to an appropriately permitted disposal facility in accordance with all federal, state, and local laws

- and regulations. If any import borrow takes place, the CPUC expects the applicant to comply with applicable state and municipal codes and regulations, including Health and Safety Code Section 57008, to adhere to the California Human Health Screening Level for lead and lead compounds in soil.
- C-4** The commenter requests that the applicant review attached as-built drawings for the existing Caltrans' electrical system at Via de la Valle. However, the commenter indicates that the as-built drawings may not cover all existing electrical facilities, so they also request that the contractor reference the subsurface locator as a work item prior to excavating in Via de la Valle to identify the existing Caltrans underground facilities and contact the Caltrans electrical maintenance staff prior to starting work for the proposed project.
- The letter containing attached as-built drawings for the existing electrical system at Via de la Valle has been forwarded to the applicant. Since the as-built drawings may not cover all existing electrical facilities, the Contractor will reference the Subsurface Locator as a work item prior to excavating in Via de la Valle, in order to identify the existing Caltrans underground facilities, and contact the Caltrans electrical maintenance staff prior to starting work for the project.
- C-5** The commenter indicates that Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle, combination of vehicles, or special mobile equipment whose size and/or weight (including load) exceeds the maximum limitations specified in the California Vehicle Code. In addition, the commenter requests that a traffic control plan be submitted to Caltrans District 11, including the interchange at Interstate 5 (I-5)/Via de la Valle, at least 30 days prior to start of any construction. This plan would include suggested detours to use during closures, including routes and signage.
- Impacts associated with construction traffic are addressed in Section 5.16, "Traffic and Transportation." Draft IS/MND page 5.16-6, Table 5.16.1, outlines relevant transportation policies and regulations, such as the need for the applicant to "obtain an encroachment permit for all proposed activities related to the placement of encroachment within, under, or over state highway right-of-way. The applicant must also obtain a special permit to operate a vehicle or combination of vehicles with special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations on state highways." The CPUC expects the applicant to comply with applicable state and municipal codes and regulations. Furthermore, the sentence beginning on Draft IS/MND page 5.16-14, line 22, states that "Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all highway crossings." Therefore, a Traffic Control Plan (TCP) would be submitted to Caltrans District 11, including the interchanges at I-5/Via de la Valle, at least 30 days prior to the start of any construction. The TCP would comprise outlining suggested detours to use during closures, including routes and signage.

C-6 The commenter requests that the IS/MND discuss and address potential impacts to I-5 and traveling public from detours, demolition, and other construction activities.

See response to Comment C-5. The proposed project would not involve demolition activities. Potential impacts from the proposed construction activities have been properly analyzed using criteria outlined in Appendix G of the CEQA Guidelines, as discussed in Section 5.16, "Traffic and Transportation" of the Draft IS/MND. Furthermore, the applicant would acquire encroachment permits and road crossing approvals, if required, and would meet the requirements of these authorizations, including implementation of a TCP that would outline detours, including routes and signage.

C-7 The commenter indicates that the ongoing Caltrans I-5 North Coast Corridor project along I-5 is in the area of the proposed project. Further, any work near the construction zone may require coordination with the Caltrans construction contractor. The commenter also states that the CPUC shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-5 be limited to times that would create the least possible inconvenience to the traveling public and that signage be posted prior to the closure in accordance with Caltrans requirements. In addition, the plans shall also outline suggested detours during the closures, including routes and signage.

See response to Comment C-5. Draft IS/MND Section 5.19, "Mandatory Findings," page 5.19-3, Table 5.19-1, lists the foreseeable projects considered in conjunction with the proposed project in the analysis of cumulative impacts. The I-5/State Route 56 Interchange Project (part of the I-5 North Coast Corridor Project) was one of the projects identified to be approved but not funded and has an estimated completion date of 2025. Since this foreseeable project has an unknown timeline, it may or may not overlap with the proposed project. Thus, the CPUC concurs that any work near the construction zone may require coordination with the Caltrans construction contractor to minimize a potential cumulative impact to traffic. Furthermore, as indicated in the Draft IS/MND, the applicant would acquire encroachment permits and road crossing approvals, if required, and would implement the requirements of these authorizations, including implementation of a traffic control plan that would outline closures and detours, including routes and signage.

C-8 The commenter indicates that the Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' ROW until an encroachment permit is approved.

See response to Comment C-5. The CPUC concurs that as part of the encroachment permit, the Highway Closure Plan should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. The sentence beginning on Draft IS/MND page 5.16-14, line 22, states that "Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by

Caltrans for all highway crossings.” Therefore, the CPUC expects the applicant to adhere to Caltrans’ procedure and recommendations of submitting a Highway Closure Plan to Caltrans District 11, as part of the encroachment permit.

C-9 The commenter indicates that any work performed within the Caltrans ROW would require discretionary review and approval by Caltrans, and an encroachment permit would be required for any work within the Caltrans ROW prior to construction. In addition, as part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans ROW, and any corresponding technical studies. The commenter requests that the IS/MND highlight all of the following that occur within the Caltrans ROW: specific environmental impacts (depth of trench), potential impacts of the proposed project, and any resource agency permits that would be required to be involved.

The CPUC concurs that any work performed within the Caltrans ROW would require discretionary review and approval by Caltrans and that an encroachment permit would be required for any work within the Caltrans’ ROW prior to construction. Prior to construction, the CPUC expects the applicant to obtain a Caltrans encroachment permit pursuant to Caltrans’ approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all work within the Caltrans ROW.

The CPUC prepared the MND to comply with the requirement of CEQA. Pursuant to CEQA, including Public Resources Code Section 21064.5 and 21082.2, the CPUC prepared the IS to determine whether significant adverse effects on the environment would result from implementation of the proposed project. The IS used the significance criteria outlined in Appendix G of the CEQA Guidelines as a basis for analysis. Potential impacts from the proposed project have been fully disclosed in the IS, which was used to support the MND. Furthermore, the Draft IS/MND, page 4-7, Table 4-1 identifies the permits that the lead and responsible agencies may require of the applicant in order to implement the proposed project.

C-10 The commenter recommends that the applicant see Chapter 600 of the Encroachment Permit Manual Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state ROW.

Comment noted. The letter containing the references to Chapter 600 of the Encroachment Permit Manual Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state ROW has been forwarded to the applicant. The CPUC expects the applicant to comply with applicable state and municipal codes and regulations, including the requirements regarding utilities and state ROW.

Native American Tribes
Comment Letter D
Viejas Band of Kumeyaay Indians



P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

December 10, 2018

Phone: 6194453810
Fax: 6194455337
viejas.com

Silvia Yanez
Project Manager
Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

RE: TL674A Reconfiguration and TL666D Removal Project

Dear Ms. Yanez,

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas.

D-1

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

D-2

Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314 or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov, for scheduling. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ray Teran".

Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

Responses to Comment Letter D Viejas Band of Kumeyaay Indians

D-1 The commenter indicates that the Viejas Band of Kumeyaay Indians (“Viejas”) has reviewed the proposed project and states that the project site has cultural significance or ties to the Viejas.

The CPUC notes that the project area crosses culturally sensitive traditional territory of the Viejas.

D-2 The commenter requests that a Kumeyaay cultural monitor be on site during ground-disturbing activities to inform the Viejas of any new developments, such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

See response to Comment D-1. The commenter’s request for onsite Viejas cultural monitoring of ground-disturbing activities is acknowledged, and that the Viejas will receive notification at least 30 days prior to ground-disturbing construction activities is verified. The Viejas will also be invited to voluntarily observe ground-disturbing activities and offer any recommendations to the qualified archaeological monitor for the proposed project. Please refer to **MM CUL-2: Cultural Resources Monitoring** for clarification of the specific steps by which cultural resources would be avoided. Beginning on Draft IS/MND page 5.5-21, line 4, MM CUL-2 has been revised as follows, “**MM CUL-2: Cultural Resource Monitoring.** The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project’s qualified archaeological monitor. ~~MM CUL-2: Cultural Resource Monitoring.~~ A Secretary of Interior–qualified archaeologist shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project. Responsibilities for the archaeologist shall include monitoring, evaluation of any finds, analysis and curation of materials, and preparation of a report detailing the results of monitoring activities ~~results report~~ conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines.” In the event of an unanticipated discovery of cultural resources or human remains during construction, **MM CUL-4: Cultural Resources Discovery** and **MM CUL-6: Treatment of Human Remains** would be implemented, respectively, as outlined in Section 5.5, “Cultural Resources.”

Applicant
Comment Letter E
San Diego Gas & Electric



Elizabeth A. Cason
Senior Counsel
8330 Century Park Court, CP32B
San Diego, CA 92123
Tel: 868-654-1560
ecason@semprautilities.com

January 7, 2019

Sent Via Electronic Mail

John Forsythe, CPUC Project Manager
CPUC TL674/TL666D Project
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102

Re: Draft Mitigated Negative Declaration for San Diego Gas & Electric Company's TL 674 & TL666D Proposed Project (A.17-06-029)

Dear Mr. Forsythe:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Draft Mitigated Negative Declaration (MND) prepared by the California Public Utilities Commission (CPUC) for the proposed TL674/TL666D Project (Proposed Project) (A.17-06-029). SDG&E commends the CPUC on its careful analysis of the Proposed Project. SDG&E's primary goal in preparing these comments is to ensure an accurate and complete record. SDG&E would be happy to provide additional information upon request. SDG&E's comments and suggested revisions are provided in the attached comment matrix.

Thank you again for the opportunity to comment on the MND and for your efforts to reach this significant milestone. We look forward to continuing to work with you to implement this important project.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth A. Cason".

Elizabeth A. Cason
Senior Counsel
San Diego Gas & Electric

Cc: Sylvia Yanez, E&E
Robert Fletcher, SDG&E
Chris Terzich, SDG&E
Stacie Atkinson, SDG&E

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Proposed Comments on the Mitigated Negative Declaration

PROPOSED COMMENTS ON THE DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)					
Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
1.0 Mitigated Negative Declaration					
1.	1-2	Line 27	Recommend including the Peñasquitos Lagoon as an environmentally sensitive area.	SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito Lagoon.	SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito <u>and Los Peñasquitos</u> lagoons.
3.0 Introduction to the Initial Study					
2.	3-2	Line 24	There are 20 topics listed in the Introduction to the Initial Study.	The content and analysis in this Initial Study is based on the current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in the 19 topics presented below.	The content and analysis in this Initial Study is based on the current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in the <u>19 20</u> topics presented below.
4.0 Project Description					
3.	4-1	Line 11	The span of TL674A that spans Via de la Valle will be reconfigured, not reconductored. In addition, the Proposed Project involves construction along C510 and C738, not C630.	The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), reconductoring of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. The proposed project would also entail conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and C630) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.	The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), <u>reconductoring reconfiguring</u> of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. The proposed project would also entail conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and <u>C630-C738</u>) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.
4.	4-2	Line 7	Del Mar Substation should be characterized as an existing substation to avoid confusion with the reader.	The main activity associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in San Diego).	The main activity associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the <u>existing</u> Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in <u>the City of</u> San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in <u>the City of</u> San Diego).
5.	4-7	Table 4-1	This table is missing the required permits to conduct archaeological and paleontological investigations/collections on state lands.	N/A	<u>Permit to Conduct Archaeological Investigations/Collections on State Parks Land and Permit to Conduct Paleontological Investigations/Collections on State Parks Land</u>

E-1

E-2

E-3

E-4

E-5

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
6.	4-8	Line 15	This sentence should be revised to indicate that the conductors will be removed. The tap pole will remain and continue to function as a tap.	Reconfiguration of TL674A, which entails removal of approximately 700 feet of 69-kV overhead tap and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;	Reconfiguration of TL674A, which entails removal of approximately 700 feet of 69-kV overhead tap conductor and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;	E-6
7.	4-8	Line 17	This sentence should be revised to indicate that TL666D is a tie line, not a tap.	Removal of TL666D, which would eliminate approximately 6 miles of 69-kV overhead tap line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza 18 Drive;	Removal of TL666D, which would eliminate approximately 6 miles of 69-kV overhead tap tie line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza 18 Drive;	E-7
8.	4-11	Line 7	This sentence should be revised to clarify that multiple conductors will terminate at the new riser pole.	The remaining conductor would terminate at a new steel riser pole, where the line would transition to an underground configuration.	The remaining conductors would terminate at a new steel riser pole, where the line would transition to an underground configuration.	E-8
9.	4-11	Line 42	As described on page 3-20 of the PEA, six 6-inch-diameter conduits will be installed.	The Underground duct bank would consist of one approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduit encased in concrete, as illustrated in Figure 4-7.	The Underground duct bank would consist of one six approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete, as illustrated in Figure 4-7.	E-9
10.	4-15	Line 3	This sentence should be revised to indicate that the splice vaults will be pre-cast. The duct bank will be cast on site.	Ducts would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8.	Ducts Splice vaults would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8.	E-10
11.	4-16	Line 7	This sentence should be revised to indicate that a distribution line will not be removed from the Del Mar Substation.	The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line, eliminating a distribution line from the Del Mar Substation.	The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line -eliminating a distribution line from the Del Mar Substation.	E-11
12.	4-16	Line 27	This sentence should be revised to indicate that this portion of the Proposed Project is located in the extension area.	It reaches the Torrey Pines State Natural Reserve and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south.	It reaches the Torrey Pines State Natural Reserve Extension and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south.	E-12
13.	4-25	Line 6	This sentence should be revised to indicate that one new riser pole will be installed. As described in the PEA, the second riser pole will be converted to a riser pole by reconfiguring an existing pole.	A single 1,000-kcmil aluminum cable installed within the duct bank would connect the two new riser poles.	A single 1,000-kcmil aluminum cable installed within the duct bank would connect the two new riser poles to the newly converted riser pole.	E-13
14.	4-33	Line 8	This sentence should be revised to indicate that a permit will be obtained from Caltrans.	For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings would require an encroachment from Caltrans.	For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings would require an encroachment permit from Caltrans.	E-14
5.1 Aesthetics						
15.	5.1-28	Line 23	The structure that is in view of this simulation is a pole, not a tower.	The height of the existing tower would remain unchanged.	The height of the existing tower pole would remain unchanged.	E-15

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
5.3 Air Quality						
16.	5.3-10	Line 42	Revision requested to accurately characterize the status of the Ozone Air Quality Management Plan.	The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O ₃ NAAQS (per the SIP submitted to the EPA in June 2007). However, the EPA will likely designate San Diego County as a nonattainment area for the new 0.075-ppm 8-hour O ₃ standard; thus, the SDAPCD submitted an updated SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS.	The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O₃ NAAQS (per the SIP submitted to the EPA in June 2007). However, the EPA will likely designate San Diego County as a nonattainment area for the new 2008 0.075-ppm 8-hour O₃ NAAQS standard; thus, the SDAPCD subsequently submitted an updated SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS.	E-16
5.4 Biological Resources						
17.	Page 5.4-44	Line 29	The Draft IS/MND should be revised to reference MM BR-5, not MM BR-3.	MM BR-3 would require that the applicant wash vehicles and equipment prior to staging onsite, and to develop a Weed Control Plan to prevent the colonization of noxious and invasive weeds that could outcompete special status plants in areas disturbed by construction activities.	MM BR- 35 would require that the applicant wash vehicles and equipment prior to staging onsite, and to develop a Weed Control Plan to prevent the colonization of noxious and invasive weeds that could outcompete special status plants in areas disturbed by construction activities.	E-17
18.	Various	Various	In the Draft IS/MND, there are multiple references indicating that MM BR-4 requires all ground-disturbing activities within 100 feet of ESAs, ESHAs, and all potentially jurisdictional aquatic features to be monitored. In the MMRP, MM BR-4 specifies that monitoring during ground-disturbing activities is required within 50 feet of areas that have the potential to support special status species. The Draft IS/MND should be revised to ensure consistency between the MMRP and other sections.	N/A	N/A	E-18
19.	Page 5.4-46	Line 27	The Draft IS/MND should be revised to be consistent with the measure language in the MMRP. This edit should be applied throughout the document.	MM BR-6 prohibits construction activities within or within 500 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Reserve Extension during nesting bird season (February 1 to August 31).	MM BR-6 prohibits construction activities within at least 500 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Reserve Extension during nesting bird season (February 1 to August 31).	E-19
20.	Various	Various	In the Draft IS/MND, there are multiple references indicating that MM BR-7 requires vehicle speeds to comply with a 10-mile-per-hour (mph) speed limit on unpaved roads during nighttime activities. In the MMRP, MM BR-7 indicates that the appropriate limit should be 15 mph. The Draft IS/MND should be revised to ensure consistency between the MMRP and other sections.	N/A	N/A	E-20
21.	Pages 5.4-48	Line 42	The Draft IS/MND refers to the incorrect measure in this location and should be revised.	MM BR-4 would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.	MM BR- 48 would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.	E-21

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
22.	5.4-58	Line 31	As acknowledged in this document and within the Implementing Agreement of the NCCP, local and regional guidelines do not supersede the NCCP in order to prevent conflict or confusion. As a result, the Draft IS/MND should be revised to reflect this.	Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures and Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP.	Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures and Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP. <u>When the direction in these respective guidelines are in conflict, SDG&E's NCCP will supersede the direction of the other referenced documents.</u>	E-22
5.5 Cultural Resources						
23.	5.5-1	Line 41	The Draft IS/MND should be revised to correctly refer to the institution's name.	These reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coast Information Center at San Diego State University.	These reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coast Information Center at San Diego State University.	E-23
24.	5.5-2	Line 1	The Draft IS/MND should be revised to refer to the correct type of search conducted. In addition, Appendix H does not contain information about the applicant's Sacred Land File Search. That information can be found in Appendix D as part of the Cultural Resources Technical Report.	The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands Record Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC's response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix H for additional information.	The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands Record File Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC's response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix DH for additional information.	E-24
25.	5.5-2	Line 14	The Draft IS/MND should be revised to refer to the correct appendix. The Paleontological Technical Study is in Appendix I.	See Appendix H for additional information.	See Appendix IH for additional information.	E-25
26.	5.5-7	Line 14	The Draft IS/MND should define what an "indefinite association" is so impacts can be assessed appropriately.	N/A	N/A	E-26
27.	5.5-7	Line 1	The Draft IS/MND should be revised to accurately describe the applicant's archaeological survey area. The 150-foot buffers around the linear alignments create a 300-foot corridor on the center of the transmission line.	An archaeological survey was conducted for an area generally matching the project's utility corridors in addition to a 300-foot buffer around the linear alignments as well as a 100-foot buffer around noncontiguous temporary work areas (Appendix D).	An archaeological survey was conducted for an area generally matching the project's utility corridors in addition to a 150-foot <u>300-foot corridor</u> around the linear alignments as well as a 100-foot buffer around noncontiguous temporary work areas (Appendix D).	E-27
28.	5.5-7	Line 36	The Draft IS/MND indicates three sites may be eligible for listing in the CRHR and Table 5.5-1 indicates four sites may be eligible. Confirm which number is accurate and which sites have been ruled out for eligibility testing.	As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CA-SDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the three sites overlapping the project's potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant's subcontractor deemed other areas too unsafe to test.	As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CA-SDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the three <u>four</u> sites overlapping the project's potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant's subcontractor deemed other areas too unsafe to test.	E-28

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
29.	5.5-9	Line 13	The Draft IS/MND should be clarified. The architectural survey was reconnaissance-level only, while the archaeological survey was intensive pedestrian. More description is needed to avoid confusion.	This survey covered the same area as the archaeological survey.	This <u>reconnaissance-level</u> survey covered the same area as the archaeological survey.	E-29
30.	5.5-9	Line 16	The Draft IS/MND should be revised to accurately reflect the citation. Isolate resources have limited research potential as stated in Foglia, Cooley, and Mello 2017, which is the citation for the given text.	P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, though as isolates may have research potential (Foglia, Cooley, and Mello 2017).	P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, <u>though</u> as isolates <u>may</u> have <u>limited</u> research potential (Foglia, Cooley, and Mello 2017).	E-30
31.	5.5-10	Line 12	The Draft IS/MND is incorrect with regards to the building evaluation. The applicant did not complete any new evaluations for this study relating to the Sorrento Valley Industrial Park. All evaluations were completed by Caltrans in 2016 and AECOM concluded that Caltrans' evaluation was accurate (see Appendix D and confidential DPR523 forms for more details).	One of the buildings within the Sorrento Valley Industrial Park was evaluated as part of this study and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP (Foglia, Cooley, and Mello 2017).	One of the buildings within the Sorrento Valley Industrial Park was <u>previously</u> evaluated <u>in 2016 as part of this study</u> and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP (Foglia, Cooley, and Mello 2017).	E-31
32.	5.5-16	Line 4	The Draft IS/MND should be revised to provide the correct name of the register.	City of San Diego Register of Historical Places	City of San Diego Register of Historical <u>Resources Places</u>	E-32
5.8 Hazards and Hazardous Materials						
33.	5.8-2	Table 5.8-1	ZIP (1,1,1-trichloroethane) and Insecticide (1,1,1-trichloroethene carrier) should be removed from this table. These materials are not approved for use by SDG&E and will not be used during the Proposed Project.	N/A	N/A	E-33
34.	5.8-3	Line 1	The Draft IS/MND should be edited to reflect the removal of insecticide from Table 5.8-1.	Besides the insecticide, none of the hazardous materials listed in Table 5.8-1 are acutely hazardous.	<u>Besides the insecticide, n</u> None of the hazardous materials listed in Table 5.8-1 are acutely hazardous.	E-34
35.	5.8-3	Line 11	The insulation used on the Proposed Project's facilities do not contain asbestos; however, other asbestos-containing materials may be present. As a result, this clarification is being requested.	The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), asbestos insulation, and universal waste materials.	The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), asbestos <u>insulation - containing materials</u> , and universal waste materials.	E-35
36.	5.8-12	Line 19	A Hazardous Materials Business Plan (HMBP) is not required until the material is actually on site, not prior to construction.	Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to project construction.	Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to <u>project construction hazardous materials being brought on site</u> .	E-36
37.	5.8-13	Line 30	The poles on the Proposed Project have not been treated with pesticides; therefore, an edit has been requested for clarity. In addition, Section 25150.7 was developed to address many unique circumstances associated with the generation and management of treated wood waste.	Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with pesticides or other chemicals. Because the chemical treatments could leach into water supplies after the disposal of the wood, Section 25150.7 was developed to restrict how and where treated wood waste can be disposed of.	Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with <u>pesticides insecticides</u> or other chemicals. <u>Because the chemical treatments could leach into water supplies after the disposal of the wood</u> , Section 25150.7 was developed to restrict how and where treated wood waste can be disposed of.	E-37

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
38.	5.8-18	Line 19	Utility lines do not contain asbestos; however, some components may contain asbestos. As a result, an edit is being requested for clarity.	For example, removal or relocation of utility lines suspected to contain asbestos requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M).	For example, removal or relocation of utility lines <u>with components</u> suspected to contain asbestos <u>may</u> requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M).
5.10 Land Use and Planning					
39.	5.10-1	Line 26	Revisions have been suggested in this location to make the proximity of the project consistent with existing land uses.	<p>The northernmost corridor alignment (TL6973D and TL674A) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and open spaces, including San Dieguito River Park, Del Mar Horse Park, and Del Mar Fair Grounds.</p> <p>North of Via Del La Valle, immediately west of I-5, the TL666D corridor follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian. The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. The TL666D corridor spans the fairgrounds' surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard.</p> <p>The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the hillside west of San Dieguito Drive. South of Crest Canyon Park, north of the Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead adjacent to Minorca Cove and behind the Del Mar Hills Elementary School grounds, adjacent to I-5. Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open space. TL666D spans approximately 0.5 miles across the Torrey Pines Reserve Extension in a southerly alignment, where power lines cross residences and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through the Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner</p>	<p>The northernmost corridor alignment (TL6973D-and TL674A) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and open spaces, including San Dieguito River Park, and Del Mar Horse Park, and Del Mar Fair Grounds.</p> <p>North <u>South</u> of Via Del La Valle, immediately west of I-5, the TL666D corridor <u>roughly parallels Jimmy Durante Boulevard, passing by Del Mar Fairgrounds, follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.</u> The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. The TL666D corridor spans the fairgrounds' surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard. <u>TL666D then follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.</u></p> <p>The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the hillside west of San Dieguito Drive. South <u>North</u> of Crest Canyon <u>Open Space</u> Park, north of the and the Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead adjacent to Minorca Cove and behind the Del Mar Hills Elementary School grounds, adjacent to west of <u>I-5.</u> Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open</p>

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				passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to a 12-kilovolt (kV) tap on the eastern side of the freeway.	space. TL666D spans approximately 0.5 miles across the Torrey Pines <u>Natural Reserve Extension Area</u> in a southerly alignment, where power lines cross residential areas and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through <u>the</u> Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to an <u>existing riser pole 12-kilovolt (kV) tap</u> on the eastern side of the freeway.
5.14 Public Services					
40.	5.14-2, 5.14-14	5.14-2: Paragraph 1; Figure 5.14-1: Sheet 5, 5.14-14: Line 7; 5.14-16: Line 40	The PEA includes an additional school within 150 feet of the Proposed Project that is not included in the Draft IS/MND. The Del Mar Nursery School (13692 Mango Drive, Del Mar, California 92014) is located approximately 175 feet west of TL666D. The closest pole (Z90268) is located southeast of the Del Mar Nursery School.	Three schools are within 1,000 feet of the proposed project's utility corridors: Solano Santa Fe Elementary School, Del Mar Hills Elementary School, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area – TL674A (WA-2). Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard.	Three <u>Four</u> schools are within 1,000 feet of the proposed project's utility corridors: Solano Santa Fe Elementary School, Del Mar Hills Elementary School, <u>Del Mar Nursery School</u> , and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area – TL674A (WA-2). <u>Del Mar Nursery School is located approximately 175 feet northwest of Work Area TL666D (WA-67).</u> Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard.
5.17 Tribal Cultural Resources					
41.	5.17-1	Line 13	The incorrect reference was used in Draft IS/MND and should be revised.	Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project. (AECOM, 2017)	Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project. (AECOM, 2017) <u>(Foglia, Cooley, and Mello, 2017)</u>
5.19 Mandatory Findings of Significance					
42.	5.19-12	Line 13	The Draft IS/MND should be revised to include three planned and proposed projects that also have potential to impact paleontological resources and could potentially have overlapping construction timelines.	N/A	N/A
43.	5.19-14	Lines 10 and 28	Line 10 indicates that three projects could occur simultaneously with the Proposed Project while Line 28 states that two projects could occur simultaneously. The Draft IS/MND should be revised for consistency.	N/A	N/A
44.	5.19-14	Line 14	In this location of the Draft IS/MND, only one project is described in the analysis while two/three are mentioned as overlapping elsewhere. The Draft IS/MND should be revised for consistency.	N/A	N/A

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6.0 Mitigation Monitoring and Reporting Plan						
45.	6-9	MM BR-6	The Draft IS/MND should be revised so that the timeframe for MM BR-6 (currently 14 days) is consistent with the Effectiveness Criteria and Timing (currently seven days).	N/A	N/A	E-45
46.	6-12	MM CUL-1 (Effectiveness Criteria)	The effectiveness criteria currently included describes MM CUL-2: monitoring in areas with the potential to contain previously unidentified arch resources. The mitigation measure is to set up buffers and ensure known resources are avoided. Suggested effectiveness criteria would be the CPUC ensuring ESA buffers are in place. The suggested language was taken from MM CUL-2, Monitoring/Reporting Action.	CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.	CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.	E-46
47.	6-12	MM CUL-1 (Timing)	The mitigation measure refers to ESA buffers at known sites only. Suggest removing “may” from sentence.	During construction – SDG&E and/or its contractors will install fencing as buffer around sites that may contain sensitive resources that will be avoided.	During construction – SDG&E and/or its contractors will install fencing as buffer around sites that may contain sensitive resources that will be avoided.	E-47
48.	6-12	MM CUL-2, (Monitoring/Reporting Action)	Suggest deletion of text that should be included in MM CUL-1. Suggest deletion of unclear text that does not go with the rest of the sentence.	The CPUC-approved archaeologist verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors and the archaeological monitor documenting the results of archaeological monitoring.	The CPUC-approved archaeologist verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors and the archaeological monitor documenting the results of archaeological monitoring.	E-48
49.	6-12	MM CUL-2, (Effectiveness Criteria)	The proposed edits to MM CUL-2’s effectiveness criteria are intended to remove some text and clarify the requirements.	The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described in implement the procedures in MM CUL-4 if an unanticipated archaeological resource is discovered during construction.	The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described in implement the procedures in MM CUL-4 if an unanticipated archaeological resource is discovered during construction.	E-49
50.	6-13	MM CUL-4, (Effectiveness Criteria)	This criterion incorrectly references fossil remains, which are covered in MM CUL-5.	Work is halted if unanticipated fossil remains are discovered and the proper protocols implemented pertaining to the treatment of said artifacts.	Work is halted if unanticipated fossil remains artifacts or other cultural resources are discovered, and the proper protocols implemented pertaining to the treatment of said artifacts.	E-50
51.	6-17	MM NOI-2	The Draft IS/MND should be revised to ensure consistency between the measure timing (20 days), Monitoring/Reporting Action (30 days), and Timing (30 days).	N/A	N/A	E-51
52.	6-18	APM REC-01	The Monitoring/Reporting Action for APM REC-01 appears to be a duplicate of the one for APM PS-01 and should be revised.	N/A	N/A	E-52

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Appendix C: Master Species Table					
53.	3	N/A	This page of the Draft IS/MND includes a reference to Appendix B; however, this is Appendix C. Recommend revising to avoid confusion.	N/A	N/A
Appendix G: Land Use Policy Matrix					
54.	1	Row 1	C738 is not located in the City of Del Mar.	The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's underground 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.	The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's undergrounding of 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.

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Global						
1.	N/A	N/A	Check all sections for CPUC’s pre-emption of local regulations. This language was missing from Section 5.5 Cultural Resources.	N/A	N/A	E-55
2.	N/A	N/A	All comments applied to the MMRP also apply to the remainder of the Draft IS/MND, where appropriate. Comments were limited to the MMRP in order to avoid duplication.	N/A	N/A	E-56
4.0 Project Description						
3.	N/A	N/A	<p>Since filing the PEA with the CPUC in June 2017, SDG&E has discovered the need to replace an existing circuit breaker at Del Mar Substation to accommodate the increased ampacity associated with TL6973. The replacement will occur within the existing substation fence line, utilizing the current foundation locations. As a result, no excavation or belowground work will be required to install the new circuit breaker. To commission the new circuit breaker, wiring within the boundary of the substation will be modified and/or replaced, as needed.</p> <p>The replacement process is anticipated to take up to four weeks to complete. In order to evaluate the potential air quality impacts associated with this replacement, a separate California Emissions Estimator Model (CalEEMod) simulation was prepared. The resulting output from this simulation is included as Attachment A: CalEEMod Reports. Modified versions of Table 5.3-8 and Table 5.3-9 incorporating these results have been provided in Attachment B: Revised Air Quality and GHG Calculations. As shown, the revised emissions will be below all applicable thresholds and the impact analysis in the Draft IS/MND adequately addresses this additional work.</p> <p>Because the new circuit breaker will contain approximately 33 pounds of sulfur hexafluoride, a revised version of Table 5.7-5 has been provided in Attachment B: Revised Air Quality and GHG Calculations incorporating the anticipated fugitive emissions associated with this new piece of equipment. As shown, the Proposed Project’s emissions will continue to be below all applicable thresholds. While this change to the substation will increase the total operations and maintenance emissions, this change will be small and is consistent with the conclusions presented in the Draft IS/MND.</p>	N/A	N/A	E-57

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5.1 Aesthetics						
4.	5.1-25	Line 16	Work areas are not intended to be permanent and would not be visible from this location.	In some instances, work areas could also be permanent and would consist of the work pads (eight work pads), 69-kV vaults (four total), and 12-kV hand holes (five total).	In some instances, work areas could also be permanent and would consist of the work pads areas (eight work pads areas), 69-kV vaults (four total), and 12-kV hand holes (five total).	E-58
5.4 Biological Resources						
5.	N/A	N/A	All counts of species by potential to occur should be revised based on the comments in this table.	N/A	N/A	E-59
6.	5.4-17	Line 37	The Draft IS/MND considered species that were detected during all biological surveys (including surveys done in 2013 and 2014) as “present.” These records are more than four years old and should be considered occurrences rather than positive detections.	N/A	N/A	E-60
7.	5.4-18 5.4-19	Line 18 Line 3	The PEA analyzed the potential for species to occur within the BSA, while the Draft IS/MND analyzed the the potential for species to occur within one mile of the Proposed Project area. This one-mile expansion does not make sense due to the variation in habitats within one mile of the Proposed Project. This expansion will lead to multiple species with no or very low potential to occur within the Proposed Project workspaces to be analyzed in the Draft IS/MND.	N/A	N/A	E-61
8.	Page 5.4-44	Line 33	The WEAP describes the sensitive biological resources (plants, wildlife, and sensitive natural communities) that crews may encounter onsite, and measures to reduce impacts to these resources. It cannot be expected that construction workers would need to identify special-status species. A qualified biologist will be onsite for this purpose. This language is inconsistent throughout the Draft IS/MND and should be revised for consistency in all locations.	MM BR-3 would require that the applicant develop a Worker Environmental Awareness (WEAP) program that would teach all project personnel how to identify the biological resources onsite to prevent incidental impacts from trampling, incidental trimming, or misidentification.	MM BR-3 would require that the applicant develop a Worker Environmental Awareness (WEAP) program that would describe to teach all project personnel how to identify the sensitive biological resources they may encounter onsite and the measures to be used to reduce impacts to these resources.	E-62
9.	Page 5.4-44	Line 38	The language in the Draft IS/MND should be clarified. MM BR-5 is intended to minimize potential impacts to sensitive species, not address each species that would experience unavoidable disturbance.	MM BR-5 would require the applicant to develop a Natural Community, Tree, and Plant Protection Plan for each species that would experience unavoidable disturbance associated with proposed project construction.	MM BR-5 would require the applicant to develop a Natural Community, Tree, and Plant Protection Plan for sensitive species that would experience unavoidable disturbance provide measures to minimize impacts associated with proposed project construction.	E-63
10.	Pages 5.4-49	Line 2	The Draft IS/MND should be revised with regard to lighting. Directing lighting downward could disturb wandering skipper due to its host plant being <i>Distichlis spicata</i> .	MM BR-7 would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat.	MM BR-7 would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat.	E-64

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11.	5.4-49	Line 35	Discharge of dredged or fill material within jurisdictional waters is not proposed and the Proposed Project will not substantially alter a streambed or adversely affect existing fish and wildlife resources. Proposed foot traffic, helicopter landing and wire pulling will not rise to the level of a potential impact to jurisdictional waters. The Draft IS/MND should be clarified to indicate that impacts would be limited to the flattening of existing vegetation.	Table 5.4-12 describes the acres of sensitive natural communities, including riparian communities, within proposed project workspaces. The exact location and acreage of impacts to each natural community cannot be fully determined at this time, because the exact location of the overhead wire-dragging footprint cannot be identified prior to wire removal, and the exact pole felling footprints and helicopter drop zones will be determined in the field based on safety and site conditions.	N/A	E-65
5.18 Utilities and Service Systems						
12.	5.18-7	Paragraphs 4 and 5	The Draft IS/MND does not provide an adequate justification for a determination of less-than-significant. The CEQA question is directly related to the construction of new facilities and subsequent environmental effects resulting from the construction and maintenance of these facilities. Because the Proposed Project will not require the construction of new water or wastewater treatment facilities, the impact determination should be no impact.	N/A	N/A	E-66
13.	5.18-8	Paragraphs 1 and 3	The response to question (c) in the Draft IS/MND does not provide an adequate justification for a less-than-significant impact determination. The Proposed Project will not require the construction of new facilities or the expansion of new facilities. Therefore, the impact determination should be no impact.	N/A	N/A	E-67
14.	5.18-9	Paragraph 3	The Draft IS/MND does not allow an option should the material be considered hazardous. As a result, an edit has been suggested to allow SDG&E the flexibility to find another appropriate facility.	This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. The impact would be less than significant.	This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the City of San Diego's Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. <u>Should the material be considered hazardous, SDG&E will dispose of the material at another site, consistent with applicable laws/regulations.</u> The impact would be less than significant.	E-68
6.0 Mitigation Monitoring and Reporting Plan						
15.	6-2	Line 33	If the proposed project involves a CPUC third-party monitor, disputes should be resolved with the third-party monitor at the field level to the extent feasible.	Disputes and complaints should be directed to the CPUC-designated Project Manager for resolution.	Disputes and complaints should be <u>resolved at the field level to the extent feasible. If disputes and complaints cannot be resolved in the field, they shall be</u> directed to the CPUC-designated Project Manager for resolution.	E-69

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16.	6-6	MM BR-2	<p>Because the Proposed Project will be conducted along an approximately 8-mile alignment, a refinement to MM BR-2 has been requested to clarify that the demarcation of work area boundaries will occur prior to the use at each individual site rather than marking the entire Proposed Project at once.</p> <p>MM BR-2 also requires all refueling to be conducted no fewer than 50 feet from all aquatic resources, water features, and ESHAs. This may not be feasible due to the proximity of some workspaces located on pavement adjacent to these resources. As a result, the Draft IS/MND should be revised to allow secondary containment to be utilized when refueling in these areas is required.</p>	<p>MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed prior to the start of construction activities. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features.</p>	<p>MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed prior to the start of construction activities <u>at each location</u>. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features. <u>Should minor equipment maintenance or refueling be required within 50 feet of these resources, secondary containment shall be used to prevent any runoff or spills.</u></p>
17.	6-7	MM BR-3	<p>The Hazardous Materials and Waste Management Plan required by MM HAZ-1 is required by existing laws and regulations and is incorporated in to the Project Description by reference, including SDG&E's Project Design Features and Ordinary Construction Restrictions. The inclusion of this plan should be considered in the baseline for which the impacts are evaluated and additional mitigation should not be required. In order to ensure Proposed Project personnel receive adequate training for safe evacuation, those requirements will be incorporated into the WEAP.</p> <p>In our experience, these handouts are often disposed of and not referenced by the hundreds of crew members that are often trained during a project of this size. As a result, it is more ecologically friendly and sustainable to have these materials available in the construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator. This information will also be reinforced during tail board meetings.</p>	<p>MM BR-3: Worker Training Program...Additionally, the applicant shall develop an informational handout or booklet for each employee that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.</p>	<p>MM BR-3: Worker Training Program...<u>Training would also entail safe evacuation, which could be required due to an unanticipated major spill or emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the work affected work site and specified, approved evacuation route(s) in case of emergency.</u></p> <p>Additionally, the applicant shall develop an informational handout or booklet for each employee that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.</p>
18.	6-8	MM BR-5	<p>This measure should be limited to protected trees. Protected trees can extend to trees associated with the species potentially occurring and the local ordinances provide for that distinction.</p>	<p>MM BR-5: Natural Community, Tree, and Plant Protection Plan (NCTPP). To minimize project-related impacts to natural communities, trees, and special status plants... A Restoration Strategy, including a long-term monitoring strategy, for each tree species and special status plant species that is known to occur within or near (within 50 feet) proposed work areas, and that therefore could be impacted by proposed project activities...In addition... "to include appropriate restoration strategies for natural communities, trees, and special status plants that are not anticipated..."</p>	<p>MM BR-5: Natural Community, <u>Protected</u> Tree, and Plant Protection Plan (NCTPP). To minimize project-related impacts to natural communities, <u>protected</u> trees, and special status plants... A Restoration Strategy, including a long-term monitoring strategy, for each <u>protected</u> tree species and special status plant species that is known to occur within or near (within 50 feet) proposed work areas, and that therefore could be impacted by proposed project activities...In addition... "to include appropriate restoration strategies for natural communities, <u>protected</u> trees, and special status plants that are not anticipated..."</p>

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19.	6-9	MM BR-5	MM BR-1 provides for on-going surveys (at least 30 days prior to activities) and appropriate phenological surveys within MM BR-5. These surveys will document unanticipated impacts to vegetation and this documentation will provide the data necessary to incorporate appropriate restoration strategies into the NCTPP. SDG&E requests a 30-day period to have adequate time to modify the NCTPP to include any unanticipated qualifying resources.	MM BR-5: Natural Community, Tree, and Plant Protection Plan (NCTPP)... Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet) of a work area, SDG&E must avoid the resource, and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP within fourteen days of initial observation, for review and approval.	MM BR-5: Natural Community, Tree, and Plant Protection Plan (NCTPP)... Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet of) a work area, SDG&E must avoid the resource, and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP within fourteen 30 days of initial observation, for review and approval.	E-73
20.	6-8	MM BR-5	Staking trees that are 50 feet away from the proposed project work areas draws unnecessary attention to these sensitive resources. In addition, the staking or flagging can easily blow away, creating unnecessary trash that can be difficult to collect. Because construction crews will be limited to approved workspaces, the benefit of not staking the trees outweighs the benefit of identifying them.	All accessible Del Mar manzanita observed within 50 feet of proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction.	All accessible Del Mar manzanita observed within 50 feet of directly adjacent to or within proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction.	E-74
21.	6-10	MM BR-6	MM BR-6 should allow the on-site avian biologist(s) to determine the appropriate buffers for avian species without prior approval from the CPUC. Requiring CPUC approval will unnecessarily delay Proposed Project construction. Further, a 100-foot minimum buffer distance may be overly protective given the construction activities, other sources of disturbance in the vicinity, topography, and other barriers between nests and construction.	The nest buffer distances described above may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.	The nest buffer distances described above may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.	E-75

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
22.	6-12	MM CUL-2	<p>It is not feasible to always have a Secretary of the Interior–qualified archaeologist monitor ground-disturbing activities for the project. A Secretary of Interior–qualified archaeologist must have a Master’s degree and one year of professional experience, and four months of supervisory experience. Standard practice is to have the Secretary of Interior–qualified archaeologist oversee qualified archaeological monitors and the archaeological monitors would monitor during construction. This change would match the text in the Monitoring/Reporting Action, where it calls for a CPUC-approved archaeologist only.</p> <p>Clarifying text added to the mitigation measure to allow the qualified archaeologist to recommend if monitoring is no longer warranted in certain areas (fill, bedrock, etc.).</p>	<p>A Secretary of Interior–qualified archaeologist shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project. Responsibilities for the archaeologist shall include monitoring, evaluation of any finds, analysis and curation of materials, and preparation of a monitoring results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines.</p>	<p>An Secretary of Interior–qualified archaeologist archaeological monitor, overseen by an archaeologist meeting the Secretary of the Interior’s standards, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project. Responsibilities for the archaeologist shall include monitoring, evaluation of any finds, analysis and curation of materials, and preparation of a monitoring results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. <u>The qualified archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.</u></p>
23.	6-12	MM CUL-2 (Location)	<p>The location requirements for MM CUL-2 should be clarified text to match what is stated in the mitigation measure.</p>	<p>...entire project area</p>	<p>...entire all cultural resource sites of significance identified within the project area</p>
24.	6-13	MM CUL-4	<p>Curation may not always be feasible if there are landowner disagreements or per tribal requests. Added other options in case curation proves infeasible during construction.</p>	<p>For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution. All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.</p>	<p>For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution <u>or repatriated or redeposited in a secure location onsite if curation is infeasible.</u> All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.</p>
25.	6-13	MM CUL-5 (Monitoring/Reporting Action)	<p>Changes have been requested to clarify the measure and accurately reflect the text in MM CUL-5.</p> <p>In addition, the paleontologist should not be responsible for verifying that SDG&E submitted the report to the CPUC.</p>	<p>SDG&E and/or its contractors verify that a qualified CPUC-approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by Paleontological the applicant is submitted 30 days prior to the beginning of construction work.</p> <p>The paleontologist will monitor construction-related activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.</p>	<p>SDG&E and/or its contractors verify that a qualified CPUC-approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by Paleontological the applicant <u>and/or its contractor</u> is submitted 30 days prior to the beginning of construction work.</p> <p>The paleontologist will monitor construction-related ground-disturbing activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.</p>

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
				At the conclusion of paleontological monitoring, the paleontologist prepares a monitoring report and verifies that SDG&E submits the report to the CPUC for review, approval, or request for changes.	At the conclusion of paleontological monitoring, the paleontologist prepares a monitoring report and verifies that SDG&E submits the report to the CPUC for review, approval, or request for changes.	Cont. E-79
26.	6-13	MM CUL-5, (Effectiveness Criteria)	The last sentence is not a complete sentence; suggest ending the sentence after “proper protocols.”	Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols relating to cleaning, storage, cataloging and...	Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols , relating to cleaning, storage, cataloging and...	E-80
27.	6-15	MM HAZ-01	A Hazardous Materials and Waste Management Plan is required by existing laws and regulations and is incorporated in to the Project Description by reference, including SDG&E’s Project Design Features and Ordinary Construction Restrictions. The inclusion of this plan should be considered in the baseline for which the impacts are evaluated and additional mitigation should not be required. It is recommended that the required evacuation training be incorporated into the WEAP training described in MM BR-3.	N/A	N/A	E-81
28.	6-17	MM NOI-1	It is possible that other agencies will require construction to occur outside of the permitted hours in the local noise ordinances. Should this occur, SDG&E will meet and confer with the appropriate local agency to obtain relief from these hours.	MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction: <ul style="list-style-type: none">City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays).	MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction: <ul style="list-style-type: none">City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays). <u>Should construction be required outside of these hours due to agency requirements, SDG&E shall meet and confer with the local jurisdictions, as needed, regarding these activities and obtain relief from these typical hours.</u>	E-82

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
29.	6-17	MM NOI-3	<p>MM NOI-3 should be revised to account for whichever threshold is higher (the local ordinance or ambient levels plus 10 dBA). Without the accommodation, the measure is too restrictive.</p> <p>As stated on Page 5.12-21 of the Draft IS/MND, temporary noise barriers near mobile noise sources are not feasible. As a result, edits to MM NOI-3 are proposed.</p>	<p>MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:</p> <ul style="list-style-type: none">Temporarily and safely installing and maintaining absorptive noise control barriers in the perimeter of construction sites and/or between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.	<p>MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance, <u>whichever is higher</u>. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:</p> <ul style="list-style-type: none">Temporarily and safely installing and maintaining absorptive noise control barriers <u>in the perimeter of construction sites and/or</u> between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.
Appendix C: Master Species Table					
30.	6	Table 1	The Draft IS/MND currently lists California adolphia (<i>Adolphia californica</i>) as having a high potential to occur. This determination is based on an "occurrence 1 mile southeast of Biological Study Area (BSA) in 2008." There is no reference provided for this occurrence. In addition, the species is easily detectable. Suggest adopting the PEA's low potential assessment.	N/A	N/A
31.	7	Table 1	Golden-spined cereus (<i>Bergerocactus emoryi</i>) is listed as having a high potential to occur due to three occurrences documented one mile east of the Proposed Project between Interstate 5 and Via de la Valle on iNaturalist. According to this website's copy, "iNaturalist is an online social network of people sharing biodiversity information to help each other learn about nature." As a result, this website should not be considered a reliable source and this species should be considered to have a moderate potential to occur as described in the PEA.	N/A	N/A
32.	8	Table 1	Sand-loving wallflower (coast wallflower) (<i>Erysimum ammodendrum</i>) is listed in the Draft IS/MND as present. The PEA had determined it to have a low potential to occur because plants were not identified correctly during the 2014 surveys. Plants mapped by RECON in 2014 were in fruit during the 2016 fall survey. The seeds of these plants were not winged and thus are more appropriately considered <i>E. capitatum</i> . As a result, this species should be considered to have a low potential to occur.	N/A	N/A

San Diego Gas & Electric Company
TL674A Reconfiguration & TL666D Removal Project

January 2019
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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
33.	11	Table 2	Burrowing owl (<i>Athene cunicularia</i>) is listed in the Draft IS/MND as having a high potential to occur. The PEA had determined it to be low potential because this species has not been detected in the BSA and the habitat is generally not suitable. Database records show that it has been detected along the Pacific Ocean near bluffs within the Torrey Pines State Natural Reserve Extension area as recently as the winter of 2012 (eBird 2016). Only wintering habitat is present; the species does not breed in or around the BSA. As a result, this species should be considered to have a low potential to occur.	N/A	N/A

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
33.	11	Table 2	Burrowing owl (<i>Athene cunicularia</i>) is listed in the Draft IS/MND as having a high potential to occur. The PEA had determined it to be low potential because this species has not been detected in the BSA and the habitat is generally not suitable. Database records show that it has been detected along the Pacific Ocean near bluffs within the Torrey Pines State Natural Reserve Extension area as recently as the winter of 2012 (eBird 2016). Only wintering habitat is present; the species does not breed in or around the BSA. As a result, this species should be considered to have a low potential to occur.	N/A	N/A

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Responses to Comment Letter E San Diego Gas & Electric

E-1 The commenter recommends that Peñasquitos Lagoon be characterized as an environmentally sensitive area in the description of surrounding natural features. To address this request, the following text change is included on the Final IS/MND page 1-2:

“SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito and Los Peñasquitos lagoons.”

E-2 The text on page 3-2 of the Draft IS/MND has been revised to correctly state the number of environmental topics included in the document:

“The content and analysis in this Initial Study is based on current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in ~~49~~ 20 topics presented below.”

E-3 The commenter recommends that the description of the span of TL674A that extends over Via de la Valle be revised. This portion of TL674A would be reconfigured as part of the proposed project, not reconducted as originally stated in the Draft IS/MND. The commenter further states that the proposed project would involve construction along C510 and C738, not C630 as incorrectly stated in the Draft IS/MND. To address this request, Draft IS/MND page 4-1 has been revised as follows:

“The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), ~~reconductoring~~ reconfiguring of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. The proposed project would also include the ~~entail~~ conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and ~~C630~~ C738) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.”

E-4 The description of the Del Mar Substation on Draft IS/MND page 4-2 has been revised as follows to clarify that the substation is an existing facility:

“The main activity associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the existing Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in the city of San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in the city of San Diego).”

E-5 Table 4-1, on Draft IS/MND page 4-7 has been revised under the State Agencies subheading to include the following two additional permits that the proposed project may require:

Permit or Approval	Agency	Requirement
<u>Archaeological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Archaeological Investigations/Collections on State Parks Land</u>
<u>Paleontological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Paleontological Investigations/Collections on State Parks Land</u>

E-6 Draft IS/MND page 4-8 has been revised as illustrated below to clarify that 700 feet of 69-kV conductor would be removed, rather than the tap as incorrectly stated in the original draft text:

“Reconfiguration of TL674A, which entails removal of approximately 700 feet of 69-kV overhead ~~tap~~ conductor and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;”

E-7 The following sentence beginning on Draft IS/MND page 4-8, line 17, has been revised to indicate that TL666D is a tie line and not a tap as originally stated:

“Removal of TL666D, which would eliminate approximately 6 miles of 69-kV overhead ~~tap~~ tie line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza 18 Drive;”

E-8 The sentence beginning on Draft IS/MND page 4-11, line 7, has been revised to clarify that multiple conductors would terminate at the new riser pole that would be installed as part of the proposed project:

“The remaining conductors would terminate at a new steel riser pole, where the line would transition to an underground configuration.”

E-9 The number of conduits that would be installed as part of the proposed project has been revised from one, as reported on Draft IS/MND page 4-11, to six, as follows:

“The underground duct bank would consist of ~~one~~ six approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete, as illustrated in Figure 4-7.”

E-10 The sentence beginning on Draft IS/MND page 4-15, line 3, has been revised to indicate that splice vaults, not duct banks, would be cast on site, as follows:

“~~Ducts~~ Splice vaults would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8.”

E-11 The sentence beginning on Draft IS/MND page 4-16, line 7, has been revised to clarify that no distribution line would be removed from the Del Mar Substation as part of the proposed project.

“The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line ~~eliminating a distribution line from the Del Mar Substation.~~”

E-12 The sentence beginning on Draft IS/MND page 4-16, line 27, has been revised to indicate that the portion of the proposed project described in the text below is located in the Torrey Pines State Natural Reserve Extension, as follows:

“It reaches the Torrey Pines State Natural Reserve Extension and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south.”

E-13 The sentence beginning on Draft IS/MND page 4-25, line 5, has been revised to indicate that one new riser pole, not two, would be installed as part of the project. As described in the Proponent’s Environmental Assessment (PEA), the proposed project would reconfigure a second, existing pole for use as a riser pole.

“A single 1,000-kcmil aluminum cable installed within the duct bank would connect the ~~two~~ new riser poles to the newly converted riser pole.”

E-14 The sentence beginning on Draft IS/MND page 4-33, line 8, has been revised to indicate that construction within ROWs under Caltrans jurisdiction would require the applicant to obtain a permit from Caltrans, as follows:

“For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings would require an encroachment permit from Caltrans.”

E-15 Draft IS/MND page 5.1-28, line 23, incorrectly characterizes the structure in the simulation as a tower when the text should reference a pole. This text has been corrected accordingly:

“The height of the existing ~~tower~~ pole would remain unchanged.”

E-16 The following text beginning at Draft IS/MND page 5.3-10, line 42, has been revised to accurately characterize the status of the Ozone Air Quality Management Plan, as follows:

~~“The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O₃ NAAQS (per the SIP submitted to the EPA in June 2007). However, the EPA designated San Diego County as a nonattainment area for new the 0.075-ppm 8-hour O₃ NAAQS Standard; thus, the SDAPCD submitted an updated a SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS.”~~

E-17 Draft IS/MND page 5.4-44, line 29, references an incorrect mitigation measure. Instead of **MM BR-3** as presented on page 5.4-44, the correct mitigation measure is **MM BR-5**; the text has been revised as follows:

~~“**MM BR-3** **MM BR-5** would require that the applicant wash vehicles and equipment prior to staging onsite....”~~

E-18 Draft IS/MND pages 5.4-44, line 37; 5.4-46, line 23; 5.4-47, line 22; and 5.4-51, line 9 incorrectly state the setback distance for monitoring ground-disturbing activities in **MM BR-4** as 100 feet, whereas the buffer stated in the **MM BR-4** text on page 5.4-40 correctly states 50 feet. The following sentences have been revised at each of the pages and lines indicated above:

~~“**MM BR-4** would require onsite biological monitoring of construction activities that would occur within ~~100 feet~~ 50 feet...”~~

E-19 The commenter observes an inconsistency in buffer distances described on Draft IS/MND page 5.4-46, line 27, compared to text in **MM BR-6** in Chapter 6.0, “Mitigation Monitoring and Reporting Plan.” The commenter recommends that the text on Draft IS/MND page 5.4-46, line 27, be revised to prohibit construction activities within 100 feet of sensitive biological areas during nesting bird season, rather than 500 feet. **MM BR-6** has been revised as follows, with relevant updates incorporated throughout the Final IS/MND to ensure consistency and provide detail relating to required setback distances.

“MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections. Additionally, the applicant shall not conduct project-related activities within at least 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), or Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31). A CPUC-approved avian biologist who is knowledgeable about avian species native to the coastal San Diego region shall conduct special status avian surveys where construction would occur during nesting bird season. The avian biologist shall conduct focused avian preconstruction surveys no more than fourteen days before project activities begin in each workspace, in areas containing or adjacent to suitable habitat for special status avian species. For project areas within 500 feet of or within suitable habitat for Western Snowy Plover (*Charadrius alexandrinus nivosus*), the surveying

avian biologist must have documented experience surveying Western Snowy Plover. Surveys shall be conducted within work areas plus a buffer large enough to encompass the ~~next~~ nest buffer of any special status avian species for which suitable habitat is present (i.e., 100 to 500 feet). In work areas that contain no suitable or potentially suitable habitat for special status avian species, and that would not be subject to any ground disturbance or vegetation trimming/removal, focused avian preconstruction surveys are not necessary.

If nesting birds are observed ~~within 500 feet of work areas within or adjacent to the lagoons, Torrey Pines State Natural Reserve Extension, ESHAs, or other proposed work areas~~ during focused avian surveys or general preconstruction surveys (see **MM BR-1**), the avian biologist shall establish appropriate, species-specific vertical and horizontal buffers between project activities and established nests and territories. ~~to be no less than~~ The buffers shall be no less than 500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plover nests (unless otherwise approved by USFWS and/or CDFW). Buffers between project activities and other avian nests shall be established on a species-specific basis, based on USFWS and CDFW recommendations and avian biologist observations. ~~the following distances for each species:~~

- ~~500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plovers;~~
- ~~300 feet (vertical and horizontal) for all other special status avian species (passerine, waders, etc.); and~~
- ~~100 feet (vertical or horizontal) from nests of non-special status avian species.~~

If non-nesting special-status avian species are observed, project activities may resume at distances greater than 100 feet from San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), and Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31), but a CPUC-approved biological monitor must be present. If project activities would occur between 100 and 500 feet of occupied (non-nesting) Western Snowy Plover habitat, then an avian biologist with documented experience surveying Western Snowy Plover must be present to observe all project activities.

~~The nest buffer distances described above~~ Nest buffer distances may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. The applicant shall notify the CPUC, USFWS, and CDFW of nest buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for nest-buffer reductions to special status species and raptor nests and will provide verification to the CPUC of this coordination when reducing such buffers. Nest buffer reductions for common, non-special-status species shall be reduced as established by protocols established in the Nesting Bird Management Plan (NBMP). Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.

The applicant shall develop an ~~Nesting Bird Management Plan (NBMP)~~ in accordance with the Avian Power Line Interaction Committee (APLIC) and USFWS guidelines (APLIC and USFWS 2005), to be submitted to the CPUC no fewer than 30 days prior to the start of construction. The plan shall contain, at a minimum, the following information and strategies intended to minimize impacts to avian species:

- Methods from APLIC Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012) that would minimize the risk of avian collisions, injuries, and electrocutions associated with new poles and aboveground utility features, including those associated with the C738 and C510 conversions;
- Species-specific USFWS and/or CDFW survey protocols and planned compliance procedures with the protocol(s);
- Survey timing, methods, and boundaries, protocols for determining whether a nest is active and how to protect active nests, documentation and reporting methods for observed active nests, and surveyor qualifications;
- Nest documentation (nest activity, active/inactive, etc.) and an established procedure for contacting the appropriate agencies (CPUC, CDFW, USFWS) with inactive nest removal requests for review;
- Nesting bird deterrent methods for activities to be conducted outside of the lagoons and Torrey Pines State Natural Reserve, but within nesting bird season; ~~and~~
- Species-specific buffer determinations relating to project components and protocols for requesting a reduced buffer distance from the CPUC and from the wildlife agencies; and
- Language indicating that buffer distances shall be based on biological data and site/species-specific observations, not generalized assumptions.

E-20 Draft IS/MND pages 5.4-47, line 29, and 5.4-48, line 15, refer to the vehicular speed limit included in **MM BR-7** that restricts vehicles traveling on unpaved roads during nighttime hours to 10 miles per hour (mph). The commenter notes that this is inconsistent with the version of this measure that appears in Chapter 6.0, "Mitigation Monitoring and Reporting Program," which references 15 mph as the nighttime speed limit for vehicles traveling on unpaved roads. The 10 mph speed limit indicated on Draft IS/MND pages 5.4-47 and 5.4-48 has been revised to 15 mph for consistency with the text of mitigation measure as it appears in Chapter 1.0, "Mitigated Negative Declaration"; 5.4, "Biological Resources"; and 6.0, "Mitigation, Monitoring, and Reporting Plan."

"**MM BR-7** additionally restricts project-related vehicles to an operating speed no faster than ~~40~~ 15 mph and requires vehicle checks for wildlife prior to moving equipment, which would reduce the risk of accidental vehicular collisions with nocturnal special status reptiles."

E-21 The commenter states that the sentence on Draft IS/MND page 5.4-48, line 42, incorrectly references **MM BR-4**, when the correct measure is **MM BR-8**. The text has been corrected as follows:

~~“MM BR-4~~ **MM BR-8** would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.”

E-22 As described in Section 19, “Conflict with Subregional Plan” of the SDG&E Natural Community Conservation Plan (NCCP) Implementation Agreement, the commenter reiterates that local and regional guidelines do not supersede the NCCP. Therefore, Draft IS/MND pages 5.4-59, line 31, has been revised to prevent conflict or confusion, as follows:

“Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures, Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP. Should there be any conflict between these guidelines, SDG&E’s NCCP would supersede the direction of the other referenced documents.”

E-23 Draft IS/MND page 5.5-1, line 41, incorrectly names the “South Coastal Information Center” as the “South Coast Information Center.” The Draft IS/MND text has been revised as follows:

“The reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coastal Information Center at San Diego State University.”

E-24 Draft IS/MND page 5.5-2, line 1, has been revised to clarify the types of records searches conducted for the proposed project’s cultural resources study, as shown below. Moreover, the text has been revised to correct the location in the Final IS/MND appendices where the Sacred Land “File” (not “Record”) Search is available for review. The Draft IS/MND incorrectly refers the reader to Appendix H in the Cultural Resources Technical Report, and has been corrected in the Final IS/MND to “Appendix D.” The text has been revised as follows:

“The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands ~~Record~~ File Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC’s response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix ~~H~~ D for additional information.”

E-25 Draft IS/MND page 5.5-2, line 14, incorrectly refers to the Paleontological Technical Study as located in Appendix H, instead of Appendix I. The IS/MND text has been corrected as follows:

“See Appendix ~~H~~ I for additional information.”

E-26 The commenter requests that the term “indefinite association,” Draft IS/MND page 5.5-7, line 14, be defined so impacts may be assessed appropriately. The following definition has been added as footnote 1 to elaborate and clarify the term “indefinite association” as follows:

“These resources include 124 prehistoric archeological sites and 41 prehistoric isolates; nine multi-component (prehistoric and historic) archaeological sites; 14 historic sites, structures or buildings; two historic isolates; and one with an indefinite association.¹”

¹ Per Foglia, Cooley, and Mello (2017), the resource noted as having an indefinite temporal association (i.e., no clear association with the prehistoric or historic periods) is a rock cairn. No site number is associated with the description of this resource when discussed in reference to the total number of resources within the CTR study area. The only other reference to a cairn within the CTR is Site Number P-37-029577. This site, however, is shown as having a prehistoric association.

E-27 Draft IS/MND page 5.5-7, line 1, has been revised to accurately describe the applicant’s archaeological survey area, a 300-foot corridor characterized by the utility line serving as the centerline with 150-foot buffers on either side. The text has been revised as follows:

“An archaeological survey was conducted for an area generally matching the project’s utility corridors in addition to a ~~300~~ 150-foot buffer (300-foot corridor) around the linear alignments, as well as a 100-foot buffer around noncontiguous temporary work areas (Appendix D).”

E-28 The commenter notes and inconsistency between Draft IS/MND page 5.5-7, line 37, which states that three sites are potentially eligible for listing in the CRHR, and Table 5.5-1, which states that there are four potentially eligible sites. The text has been revised to correct the inconsistency, as follows:

“As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CASDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the ~~three~~ four sites overlapping the project’s potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant’s subcontractor deemed other areas too unsafe to test.”

E-29 The commenter requests that the Final IS/MND clarify and correctly distinguish between *reconnaissance-level* and *intensive-pedestrian* surveys; the Draft IS/MND page, 5.5-9, line 13, has been revised as follows:

“This reconnaissance-level survey covered the same area as the archaeological survey.”

E-30 The following text passage beginning on Draft IS/MND page 5.5-9, line 16, citing Foglia et al. (2017) has been revised to more accurately characterize the eligibility of the two isolates referenced in the statement:

“P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, ~~though~~ as isolates ~~may~~ have limited research potential.” (Foglia, Cooley, and Mello 2017)

E-31 The Draft IS/MND page 5.5-10, line 12, incorrectly states that the applicant conducted new building evaluations of the Sorrento Valley Industrial Park. These evaluations were completed by Caltrans in 2016, and independent analysis by the firm AECOM concurs with Caltrans’ evaluation. The text has therefore been revised as follows:

“One of the buildings within the Sorrento Valley Industrial Park was previously evaluated in 2006 ~~as part of this study~~ and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP.” (Foglia, Cooley, and Mello 2017)

E-32 The commenter notes that Draft IS/MND page 5.5-16, line 4, states the name of the historic register incorrectly; the text has been revised as follows:

“City of San Diego Register of Historical ~~Places~~ Resources”

E-33 According to the applicant, SDG&E has not approved ZIP (1,1,1-trichloroethane) and Insecticide (1,1,1-trichloroethane carrier) for workplace use and therefore these chemicals would not be used during project activities. The commenter requests revising Draft IS/MND Table 5.8-1, page 5.8-2, as follows:

Other Materials Used	
Methyl alcohol	Canned spray paint
Ammonium hydroxide	Paint thinner
ZIP (1,1,1 trichloroethane)	Safety fuses
Eyeglass cleaner (contains methylene chloride)	Contact Cleaner 2000 (precision aerosol cleaner)
Hot stick cleaner (cloth treated with polydimethylsiloxane)	WD-40
Insecticide (1,1,1 trichloroethane carrier)	ZEP (safety solvent)
Insulating oil (inhibited, non-polychlorinated biphenyl)	ABC fire extinguisher
	Air tool oil
	Mastic coating

E-34 The sentence beginning on Draft IS/MND page 5.8-3, line 1, has been revised to indicate removal of insecticide from Table 5.8-1 and to clarify that none of the referenced chemicals are acutely hazardous. The text has been updated as follows:

~~Besides the insecticide,~~ None of the hazardous materials listed in Table 5.8-1 are acutely hazardous.

E-35 The sentence beginning on Draft IS/MND page 5.8-2, line 11, has been revised as follows to clarify that insulation at the project facilities does not contain asbestos, though asbestos-containing materials may be present on the project site:

The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), potentially asbestos insulation-containing materials, and universal waste materials.

E-36 The sentence beginning on Draft IS/MND page 5.8-12, line 19, has been revised to accurately describe when a Hazardous Materials Business Plan (HMBP) is required, as follows:

Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to ~~project construction~~ hazardous materials being brought on site.

E-37 The sentence beginning on Draft IS/MND page 5.8-12, line 30, has been revised to clarify that project poles have not been treated with pesticides. The commenter notes that California Health and Safety Code (HSC) Section 25150.7 addresses the circumstances associated with generation and management of treated wood waste. The text has been revised as follows:

Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with ~~pesticides~~ insecticides or other chemicals. ~~Because the chemical treatment could leach into water supplies after the disposal of the wood,~~ Section 25150.7 includes restrictions relating to how and where treated wood waste may be disposed of.

E-38 The sentence beginning on Draft IS/MND page 5.8-18, line 19, has been revised as follows to accurately indicate that utility lines do not contain asbestos, but that some components may contain asbestos:

For example, removal of relocation of utility lines with components suspected to contain asbestos may requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal regulations 61, Subpart M).

E-39 The following revisions have been made in the text from on Draft IS/MND pages 5.10-1, line 25, to 5.10-2, line 9, to correct the description of surrounding land uses and geography in the project area and vicinity:

The northernmost corridor alignment (TL6973D and ~~TL674A~~) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and

open spaces, including San Dieguito River Park, and Del Mar Horse Park, ~~and Del Mar Fair Grounds.~~

~~North~~ South of Via Del La Valle, immediately west of I-5, the TL666D corridor roughly parallels Jimmy Durante Boulevard, passing by the Del Mar Fairgrounds. follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian. The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. ~~The TL666D corridor spans the fairgrounds' surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard. TL666D then follows a segment of the Coast to Coast Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.~~

The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the hillside west of San Dieguito Drive. ~~South~~ North of Crest Canyon Open Space Park, ~~north of the and the~~ Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead adjacent to west of Minorea Cove and behind the Del Mar Hills Elementary School grounds, adjacent to I-5. Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open space. TL666D spans approximately 0.5 miles across the Torrey Pines Natural Reserve Extension Area in a southerly alignment, where power lines cross ~~residences~~ residential areas and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through ~~the~~ Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to an existing riser pole 12-kilovolt (kV) tap on the eastern side of the freeway.

E-40 The commenter notes an inconsistency between the PEA and the Draft IS/MND regarding the number of schools within 150 feet of the proposed project site.

A review of the PEA indicates an additional school/educational facility near project components that is not identified in the Draft IS/MND. The Del Mar Nursery School (13692 Mango Drive, Del Mar, California 92014) is located approximately 175 feet west of TL666D. The closest project component, a pole (Z90268), is located southeast of the Del Mar Nursery School. Revisions have been made throughout Sections 5.8, "Hazards and Hazardous Materials"; 5.12, "Noise"; and 5.14, "Public Services" of the Final IS/MND to incorporate this information.

Figure 5.12-1 “Noise-Sensitive Receptors within 1,000 Feet of the Proposed Project” and Figure 5.14-1 “Public Services near the Proposed Project Vicinity” have been revised to include the omitted facility.

Additional revisions associated with the proximity of schools and educational facilities to project components have been made per clarifications to the list of schools identified within 1,000 feet of proposed project activities. These revisions have been incorporated into Figures 5.12-1 and 5.14-1, and the following text changes are intended to include all schools and educational facilities within 1,000 feet of proposed project components.

~~Three~~ Five schools are within 1,000 feet of the proposed project’s utility corridors: ~~Solano Santa Fe Elementary School~~, Del Mar Hills Elementary School, Therapeutic Learning Center, Del Mar Nursery School, Brighter Future Preschool and Child Development Center, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). ~~Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area TL674A (WA-2).~~ Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard. Therapeutic Learning Center is located approximately 75 feet west of the TL674A Underground Work Area and is across the street from the Del Mar Substation. Del Mar Nursery School is located approximately 175 feet west of the TL666D project component (WA-67). Brighter Future Preschool and Child Development Center is located approximately 400 feet west of the TL666D project component (WA-100 and WA-102).

E-41 The commenter states that the citation on Draft IS/MND page 5.17-1, line 13, incorrectly references its source. The text has been revised as follows to accurately reference the source documentation.

Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project. ~~(AECOM 2017)~~ (Foglia, Cooley, and Mello, 2017)

E-42 The commenter recommends revising the discussion of the Mandatory Findings of Significance, Draft IS/MND page 5.19-12, to include three reasonably foreseeable projects that, according to the commenter, also have potential to impact paleontological resources and could potentially have overlapping construction timelines.

As explained below, the authors of the MND do not consider this discussion to be incomplete or to contain an omission. As explained on the Draft IS/MND page 5.19-11, the geographic scope of cumulative cultural, paleontological, and tribal resources comprises all ground-disturbing projects within 100 feet of proposed project work areas. This scope is limited because cultural resources are discrete and typically not very large, such that two projects would need to be located near one another (and both engage in similar soils disturbing activities) to potentially impact—and exacerbate impacts—to the same resource.

Therefore, the following sentence, beginning on Draft IS/MND page 5.19-12, line 11, has been deleted:

~~“The following planned and proposed projects also have potential to impact paleontological resources and could potentially have overlapping construction timelines.”~~

The deleted sentence at the beginning on Draft IS/MND page 5.19-12, line 21 has been replaced with the following text:

“While the project may have the potential to adversely affect paleontological resources, it is not anticipated to result in or contribute considerably to any cumulative impacts because the conditions for cumulative paleontological resource impacts are not met—that is, none of the foreseeable projects would necessitate ground-disturbing activities within 100 feet of the proposed project such that soil disturbance resulting from the proposed project and from other reasonably foreseeable projects would exacerbate the potential for cumulative impacts. Therefore, no cumulative paleontological resource impacts are likely; potential impacts would be limited to project effects that would be subject to mitigation identified in this IS/MND and would not be cumulatively considerable.”

- E-43** Beginning on Draft IS/MND page 5.19-14, line 14, the commenter states that only one project is included in the analysis of cumulative hydrological impacts, while two or three reasonably foreseeable projects are commonly analyzed in combination with the proposed project in the other topical analyses in Section 5.19, “Mandatory Findings of Significance.”

The commenter is correct in noting that only one reasonably foreseeable project is specified by name—the El Camino Real Bridge/Road Widening Project—while the others, as illustrated in the excerpt from Draft IS/MND page 5.19-14, lines 10 to 12, below, are named specifically in other analyses.

“...As previously discussed, construction of the proposed project and three of the projects listed in Table 5.19-1 could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the proposed project.”

- E-44** The commenter implies that the Draft IS/MND should be revised to be consistent with other cumulative analyses in Section 5.19, “Mandatory Findings of Significance.”

As discussed on Draft IS/MND page 5.19-2, cumulative impacts may be evaluated based on a list-based or a projections-based approach and the CEQA Guidelines are not prescriptive as to which approach a lead agency may use in evaluating potential cumulative effects. In the case of cumulative hydrological impacts, the commenter states that the cumulative projects cited in the evaluation of hydrological impacts is inconsistent with other environmental topics included in the evaluation of mandatory findings in this Final IS/MND.

In consideration of these possible cumulative impacts, for example, the construction schedule of the El Camino Real Bridge/Road Widening Project could potentially overlap project construction activities, which may affect hydrology and water quality because of combined soil disturbance from grading, clearing, and excavation. These activities could cause erosion and sedimentation, and thus degrade water quality. However, the potential for soil erosion and sedimentation would be minimized at this site through the implementation of SWPPPs, which would be required for all projects that disturb one or more acres of soil. Further, while minor alterations to drainage patterns could occur during construction of the proposed project, all areas disturbed during grading would be restored to original contours, and surrounding areas would be restored and repaired, as appropriate. At other sites less than an acre in size where construction work could occur concurrent with and near project work areas, hydrological impacts would be minimized through implementation of municipal BMPs or other practices under a Conditional Exclusion permit, meaning that grading, earth-moving, and other activities would not, on a site-per-site basis result in substantial run-off or degradation of water quality. Therefore, with implementation of the SWPPP and BMPs requirements for the proposed project and potential cumulative work sites in the vicinity, cumulative impacts to hydrology and water quality are expected to be less than considerable.

E-45 The commenter states that the “Effectiveness Criteria” column on Draft IS/MND page 6-9 is inconsistent with the timeframe described in **MM BR-6**. The commenter asserts that the data point in the Effectiveness Criteria column for **MM BR-6** should be revised so that the timeframe described in **MM BR-6** (currently 14 days) is consistent with the timeframe described in the Effectiveness Criteria column (currently seven days). The text has been revised to correct this inconsistency:

“Preconstruction surveys for active bird nests are conducted within ~~7~~ 14 days of the start of construction, and appropriate measures are implemented to prevent disturbance to any nests within or near the construction area.”

E-46 The effectiveness criteria included in **MM CUL-1**, Draft IS/MND, page 6-12, describe monitoring of archeological resources in areas with the potential to contain previously unidentified resources. This mitigation measure requires establishing buffers to ensure that known resources would be avoided. The commenter therefore suggests that the appropriate effectiveness criterion be directed at the CPUC to ensure that buffers have been established around environmentally sensitive areas. The text in Chapter 6.0 has therefore been revised as follows:

“CPUC verifies that SDG&E and/or its contractors erect protective barriers with appropriate signage around any environmentally sensitive areas ~~approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.~~”

E-47 **MM CUL-1**, on Draft IS/MND page 6-12, calls for the establishment of buffers around areas known to support sensitive archaeological resources. Because this measure deals with protecting

areas known to be sensitive for such resources, the text in the “Timing” column of Table 6-1 with respect to MM CUL-1 has been revised for clarity:

“During construction – SDG&E and/or its contractors will install fencing as buffers around sites that ~~may~~ are known to contain sensitive archaeological resources, and that will be avoided.”

E-48 The commenter suggests removing unclear text in the “Monitoring/Reporting Action” column on Draft IS/MND page 6-12 that is discordant with the requirements in **MM CUL-1**; this text has been revised as follows:

“The CPUC-approved archaeologist verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. ~~CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas.~~ The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors ~~and the archaeological monitor documenting the results of archaeological monitoring.~~”

E-49 The text on Draft IS/MND page 6-12 has been revised as follows to clarify the effectiveness criteria in **MM CUL-2**:

“The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described ~~in implement the procedures in~~ **MM CUL-4** if an unanticipated archaeological resource is discovered during construction.”

E-50 The criterion shown in the text as part of **MM CUL-4** incorrectly references fossil remains, which are addressed in **MM CUL-5**. The text of **MM CUL-4** has therefore been revised to clarify that the measure’s actions refer to artifacts and other cultural resources as follows:

“Work is halted if unanticipated ~~fossil remains~~ artifacts or other cultural resources are discovered and the proper protocols implemented pertaining to the treatment of said artifacts.”

E-51 The commenter notes an apparent inconsistency in the timing of requirements in **MM NOI-2**, presented on Draft IS/MND page 6-17. This measure requires the applicant to notify residents within 50 feet of project components at least 30 days prior to commencement of construction work. **MM NOI-2** further requires the applicant to provide proof that the notification was carried out (e.g., in the form of an affidavit) to the CPUC 20 days prior to the start of construction.

The commenter’s requested revision to address inconsistencies in the timing of requirements in **MM-NOI-2** is not necessary because the measure’s notification requirements are not

contradictory. The measure's core requirement pertains to notifying residents within 50 feet of construction activities that would produce intermittent noise. After the applicant sends notices to affected parties, the measure then requires the applicant to submit proof of this notification and related coordination to the CPUC 20 days prior to the beginning of construction, meaning the applicant can supply the CPUC a proof of notice and coordination up to 10 days after sending this notice to affected residents. No text changes to this measure are warranted.

E-52 The commenter states that the "Monitoring/Reporting Action" column in Chapter 6.0, "Mitigation, Monitoring, and Reporting Plan" for **APM REC-01** appears duplicative of **APM PS-01** and should be revised.

The "Monitoring/Reporting Action" column for **APM REC-01** on Draft IS/MND page 6-18 has been revised so that it corresponds properly with the APM and is not duplicative of the "Monitoring/Reporting Action" column for **APM PS-01**.

"CPUC to verify that SDG&E and/or its contractors posts signage at access points to recreational facilities that may be subject to access restrictions no less than four weeks prior to the beginning of construction activities within or adjacent to the affected facilities. ~~has contacted the appropriate personnel at the facilities where construction would occur within 250 feet at least 60 days prior to the beginning of construction.~~"

E-53 The commenter notes that Appendix C: Master Species Tables of the Draft IS/MND incorrectly refers to Appendix B on a secondary cover page.

The secondary cover page in Appendix C that refers to Appendix B has been removed.

E-54 Draft IS/MND Appendix G: Land Use Planning and Policy Matrix, row 1, incorrectly states that distribution line C738 is located in the city of Del Mar. The text has been corrected as follows:

"The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's undergrounding of 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.

E-55 The following passages pertain to the CPUC's preemptive authority in the regulation of specific resources. These passages have been added to the resources sections indicated, and one passage has been moved within 5.18, Utilities and Service Sections," as indicated below:

Section 5.5, "Cultural Resources," Draft IS/MND page 5.5-15, insert at line 30: "The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive

authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to historic preservation and archaeological and cultural resources within the project area and vicinity for informational purposes.”

Section 5.11, “Mineral Resources,” Draft IS/MND page 5.11-52, insert at line 1: “The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to mineral resources, this analysis presents local policies, ordinances, and guidelines pertinent to mineral resources within the project area and vicinity for informational purposes.”

Section 5.13, “Population and Housing, Draft IS/MND page 5.13-3, insert at line 38: “The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to population and housing, this analysis presents local policies, ordinances, and guidelines pertinent to population and housing within the project area and vicinity for informational purposes.”

Section 5.14, “Public Services,” Draft IS/MND page 5.14-13, insert at line 3: “The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to public services, this analysis presents local policies, ordinances, and guidelines pertinent to public services within the project area and vicinity for informational purposes.”

- E-56** The commenter states that all comments they have made in reference to Section 6.0, “Mitigation, Monitoring, and Reporting Plan” also apply to the remainder of the Draft IS/MND, where appropriate. Comments were limited to the MMRP in order to avoid duplication.

Where appropriate, revisions to the Draft IS/MND based on comment responses to this letter were made in both the applicable resource area sections, Chapter 1.0, “Mitigated Negative Declaration,” and in Chapter 6.0, “Mitigation, Monitoring, and Reporting Plan.”

- E-57** According to information provided by the applicant, increased ampacity associated with transmission line 6973, which would replace 666D as part of the proposed project, may also require replacing a circuit breaker at the Del Mar Substation. This process, described on page 4-41 of this Final IS/MND, may take up to eight weeks to complete, depending on whether foundation work would be required. The construction activities associated with the circuit breaker replacement would be scheduled, where feasible, to overlap other activities to maintain the original estimated 12-month timeline for project completion.

The proposed project’s air quality evaluation has been revised to incorporate supplemental emissions modeling that captures the potential incremental emissions output associated with

the removal and replacement of the circuit breaker at the Del Mar Substation. A California Emission Model Estimator (CalEEMod) simulator was prepared for the potential construction activities at the substation site, and the results of this supplemental analysis are reported in the Substation Modifications CalEEMod Report (see Final IS/MND Appendix A, Attachment 3). These results have also been incorporated into Table 5.3-8 and Table 5.3-9, as revised.

The revised emission outputs would be below applicable thresholds, and the less-than-significant conclusions reached for the analyses in the Draft IS/MND would adequately cover the supplemental emissions associated with the potential circuit breaker construction activities at the Del Mar Substation. As illustrated in the revised Table 5.7-5 in the Final IS/MND, the potential circuit breaker replacement work would generate approximately 33 pounds of sulfur hexafluoride not indicated in the Draft IS/MND emissions outputs, as well as additional fugitive dust associated with the circuit breaker. In light of the additional emissions source reported in the supplemental analysis, increases in operational and maintenance emission outputs would be negligible and total emissions outputs would be under applicable thresholds for all reported constituents, consistent with the conclusions presented in the Draft IS/MND.

In light of this supplemental analysis, Tables 5.3-8 (page 5.3-16), 5.3-9 (page 5.3-17), and 5.7-5 (page 5.7-8) have been revised as follows:

Table 5.3-8 Peak Daily Uncontrolled Construction Emissions

Year: 2019						
Emission Source	Emissions (pounds per day)					
	PM _{2.5}	PM ₁₀	NO _x	SO _x	CO	VOCs
Construction Equipment and Vehicles	12.39	58.20	137.44	0.30	116.56	13.67
Helicopter Use ^(a)	1.89	1.89	67.80	31.38	31.92	25.81
Substation Modifications	<u>0.61</u>	<u>0.66</u>	<u>11.45</u>	<u>0.02</u>	<u>8.59</u>	<u>1.13</u>
TOTAL	14.28 <u>14.89</u>	60.09 <u>60.75</u>	205.24 <u>216.69</u>	31.68 <u>31.70</u>	148.48 <u>157.07</u>	39.48 <u>40.61</u>
Threshold	55	100	250	250	550	75
Threshold Exceeded?	No	No	No	No	No	No

Note:

^(a) See Appendix A, "Air Quality Emissions Report" for factors and assumptions contributing to helicopter air quality emission estimates during construction.

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

1

Table 5.3-9 Peak Daily Controlled Construction Emissions

Year: 2019						
Emission Source	Emissions (pounds per day)					
	PM _{2.5}	PM ₁₀	NO _x	SO _x	CO	VOCs
Construction Equipment and Vehicles	9.20	26.23	137.44	0.30	116.56	13.67
Helicopter Use ^(a)	1.89	1.89	67.80	31.38	31.92	25.81
Substation Modifications	<u>0.61</u>	<u>0.66</u>	<u>11.45</u>	<u>0.02</u>	<u>8.59</u>	<u>1.13</u>
TOTAL	<u>11.09-11.70</u>	<u>28.12-28.78</u>	<u>205.24-216.69</u>	<u>31.68-31.70</u>	<u>148.48-157.07</u>	<u>39.48-40.61</u>
Threshold	55	100	250	250	550	75
Threshold Exceeded?	No	No	No	No	No	No

Note:

^(a) Appendix A, "Air Quality Emissions Report" for factors and assumptions contributing to helicopter air quality emission estimates during construction.

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

2

Table 5.7-5 Greenhouse Gas Construction Emissions

Category	GHG Emissions (MT)		
	CO ₂	CH ₄	N ₂ O
Construction Equipment and Vehicles	899.66	0.16	0.00
Helicopter Use ^(a)	73.50	0.00	0.00
Substation Modifications	<u>23.31</u>	<u>0.01</u>	<u>0.00</u>
Total Construction Emissions	<u>973.16-996.47</u>	<u>0.16-0.17</u>	0.00
Global Warming Potential	1	21	310
Total CO ₂ e	<u>973.16-996.47</u>	<u>3.44-3.57</u>	0.00
Total CO ₂ e	<u>976.6-1000.04</u>		
Amortized Construction Emissions (Amortized over 30 years)	<u>32.55-33.33</u>		
Annual Fugitive SF ₆ Emissions ^(b)	<u>1.79</u>		
Total Annual CO ₂ e	<u>35.12</u>		
SCAQMD Significance Threshold	10,000		
SCAQMD Significance Threshold Exceeded?	No		

Key:

^(a) See Appendix E, *Greenhouse Gas Helicopter Emission Report*, for helicopter greenhouse gas emission estimates during construction.

^(b) The replacement of an existing circuit breaker (which is needed to meet new SDG&E design standards) at the Del Mar Substation will contain approximately 33 pounds of SF₆, with a maximum annual leak rate of 0.5 percent.

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

MT = metric tons

SCAQMD = South Coast Air Quality Management District

SDG&E = San Diego Gas & Electric Company

SF₆ = sulfur hexafluoride

3

E-58 The commenter note that Draft IS/MND page 5.1-25, line 16, indicates that work areas could be permanent. However, the work areas described would not be permanent. The text has been revised as follows.

~~In some instances~~ Work areas ~~could also be permanent and~~ would consist of the work pads (eight total), 69-kV vaults (four total), and 12-kV hand holes (five total).

E-59 The commenter requests that all counts of species by potential to occur be revised based on incorporated comment responses (see Comments E-84 through E-87). Species counts have been revised on Draft IS/MND Page 5.4-18, and where appropriate throughout the document, these counts have been revised.

“Based on the literature and database review described in Section 5.4.1, “Approach to Data Collection,” 51 special status plants have the potential to occur within 1 mile of the project area. Of these 51 species, ~~47~~ 16 are present within the BSA, ~~40~~ nine have a high potential to occur within the BSA and/or within 1 mile of the project area, and 24 have a low or moderate potential to occur within 1 mile of the project area or are not expected to occur.”

E-60 The commenter requests that the Final IS/MND not consider species that were detected during 2013 and 2014 surveys as “present” because such occurrences are more than four years old. Instead, the commenter requests that these species be considered occurrences, but not an indication of species present.

Identification of species observed during project-specific 2013 and 2014 surveys is consistent with the methodology described on Draft IS/MND page 5.4-17, line 34, through page 5.4-18, line 14. For analytical consistency, and based on biological analysis, these species will remain in the analysis under a “present” occurrence threshold.

E-61 The commenter notes that while the PEA analyzed the potential for special status species to occur within only the Biological Survey Area (BSA), Draft IS/MND pages 5.4-18 through 5.4-19 refer to the potential for species to occur within 1 mile of the proposed project area. The commenter states that because of habitat variation within 1 mile of the proposed project, the increased 1-mile analytical buffer could lead to multiple species with no or low occurrence potentials to be analyzed in the Draft IS/MND, and requests a revision to this methodology to ensure that this does not occur.

The special status species occurrence potentials described on Draft IS/MND pages 5.4-17 through 5.4-18 state that a special status species is only identified as “Present” if it was identified in the BSA during surveys. Special status species that have recently been documented within one mile of proposed project components may have a “High” or “Moderate” occurrence potential, based on nearby habitat suitability. Therefore, special status species recently observed outside of the BSA but within 1 mile of project components have not been identified as “Present” or analyzed as such in the IS/MND. Species with “Low” or

“No” occurrence potential have been identified as such, and were not further analyzed in the Draft IS/MND (see pages 5.4-18 through 5.4-21).

Additionally, while there is indeed substantial potential habitat variation throughout and surrounding the proposed project area, special status species that are fully restricted to habitat types that do not occur within the proposed project area but do occur within 1 mile of the proposed project (such as sandy beaches, open ocean, and the intertidal zone) were not included as part of the analysis. The following revisions have been made to Draft IS/MND page 5.4-18, line 22, and page 5.4-19, line 8, respectively, for clarification.

“Based on the literature and database review described in Section 5.4.1, “Approach to Data Collection,” 51 special status plants have the potential to occur within 1 mile of the project area. Of these 51 species, ~~47~~ 16 are present within the BSA, ~~40~~ nine have a high potential to occur within the BSA and/or within 1 mile of the project area, and 24 have a low or moderate potential to occur within 1 mile of the project area or are not expected to occur. Three of the special status plant species that are present or have a high potential to occur are listed as threatened or endangered by the ESA or CESA. Special status plant species that are fully restricted to habitats and natural communities that may occur within 1 mile of the proposed project, but that do not occur within the proposed project area (such as sandy beaches and the intertidal zone), were not identified as having a potential to occur. Special status plant species present in the BSA or having high potential to occur within 1 mile of the project area are listed in Table 5.4-3. Additional information, including habitat requirements of all special status plant species that could potentially occur within or near the project area, can be found in the Appendix C”

“Based on the literature and database review, 92 special status wildlife species have the potential to occur within 1 mile of the project area. Of these species, 24 are present within the BSA, 23 species have a high potential to occur within the BSA or within 1 mile of the proposed project, and 46 species have no, low, or moderate potential to occur within 1 mile of the proposed project area. Seven species that are present or have a high potential to occur are listed as endangered under the ESA or CESA, and one is a candidate for listing under CESA. Special status wildlife species that are fully restricted to habitats that may occur within 1 mile of the proposed project, but that do not occur within the proposed project area (such as sandy beaches, open ocean, and the intertidal zone) were not identified as having a potential to occur. Special status wildlife species that meet the criteria of “present” or “high potential” are listed in Table 5.4-4. Additional information, including habitat requirements of all special status wildlife species that could potentially occur within or near the project area, can be found in Appendix C.”

- E-62** The commenter requests that the language on Draft IS/MND page 5.4-44, line 33, be revised to better reflect the intent of **MM BR-3: Worker Training Program**. The commenter notes that the Draft IS/MND states that the Worker Environmental Awareness Program (WEAP) should not require all project personnel to fully identify all potential biological resources on site, but rather should appropriately describe such resources to them, as biological resource identification is the

role of the qualified biologist. The commenter notes that this language should be revised throughout the Final IS/MND where appropriate. The following language has been revised on Draft IS/MND page 5.4-44, line 33, and where appropriate throughout the document.

“**MM BR-3** would require that the applicant develop a Worker Environmental Awareness (WEAP) program that would describe to ~~teach~~ all project personnel ~~how to identify~~ the biological resources onsite to prevent incidental impacts from trampling, incidental trimming, or misidentification.”

- E-63** The commenter requests clarification to language on Draft IS/MND page 5.4-44, line 38, and elsewhere throughout the document related to MM BR-5: Natural Community, Protected Tree, and Plant Protection Plan. The requested revision would clarify the intent of the mitigation measure, which is to minimize potential impacts to sensitive species rather than address each species that would experience unavoidable disturbance. To address this request, the following revisions on Draft IS/MND Page 5.4-44, and where appropriate throughout the document:

“**MM BR-5** would require the applicant to develop a Natural Community, Protected Tree, and Plant Protection Plan for ~~each sensitive species~~. The Plan would provide measures to minimize impacts to sensitive plants that would experience unavoidable disturbance associated with proposed project construction.”

- E-64** The commenter requests that Draft IS/MND page 5.4-49, line 2, be revised with regard to nighttime lighting, because directing nighttime lighting downward could disturb the wandering skipper, which may be present on its host plant, *Distichlis spicata*.

The commenter’s concern that shielding nighttime lighting downward could disturb the wandering skipper, and that nighttime lighting should not be shielded downward, is inconsistent with surveyed biological findings at the site. Nighttime lighting is anticipated for project activities along Via de la Valle. The 2017 Wandering Skipper Report did not identify suitable habitat for wandering skippers at these work areas, but it did identify suitable habitat across the street, approximately 600 feet south of Via de la Valle. If nighttime lighting is not shielded downward, it could disturb wandering skippers within this suitable habitat area. Page 5.4-49, Line 2, of the Draft IS/MND has been revised as follows for clarification:

“**MM BR-7** would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat, or into suitable wandering skipper habitat documented south of Via de la Valle. Combined, these measures would reduce impacts on wandering skipper and western monarch butterfly to less than significant.”

- E-65** The commenter requests a modification to language on Draft IS/MND page 5.4-49, line 35, to clarify that dredge or fill within jurisdictional waters is not proposed as part of project activities. The commenter also requests that scope of project-related impacts be clarified to reflect that these

impacts would be temporary and limited to the flattening of existing vegetation. This revision has been made to the text as follows:

“Table 5.4-12 describes the acres of sensitive natural communities, including riparian communities, within proposed project workspaces. Because all project-related biological resource impacts would be temporary and short term, only known and potential acreages associates with these impacts are described. The exact location and acreage of temporary impacts to each natural community cannot be fully determined at this time, because the exact location of the footprint associated with overhead wire-dragging cannot be identified prior to actual wire removal, similarly the footprint area associated with pole felling and helicopter drop zones would be determined in the field based on safety and site conditions. “Potential Temporary Impacts,” therefore, refer to the entire possible footprint (in acres) in which a more limited scope of impact (from activities such as walking, pole felling, etc.) could occur. Impacts to jurisdictional waters, such as those resulting from dredging and filling activities, are not included as part of the proposed project.”

E-66 The commenter asserts that the impacts analysis for CEQA criterion b on Draft IS/MND page 5.18-7 does not adequately justify a “less than significant” impact determination. The commenter notes that the CEQA checklist question relates directly to the construction of new facilities and to the subsequent environmental effects that could result from the construction of such facilities. Therefore, the commenter asserts that because the proposed project would not require the construction of new water or wastewater treatment facilities, the impact determination should be revised to “no impact.”

In addition to pertaining to the need to build new water or wastewater treatment facilities associated with the proposed project, the CEQA significance threshold criterion b for utilities and services systems requires an evaluation of whether or not existing water or wastewater treatment facilities would need to be expanded as a result of the proposed project. The question is directed toward projects or programs that would require new or expanded water or wastewater treatment facilities, the construction of which could cause significant environmental effects. While the proposed project would not directly require the construction or expansion of such facilities, it would generate wastewater that would need to be treated at existing facilities, in addition to current non-project treatment volumes. Therefore, the impact determination under CEQA criterion b in Chapter 5.8, “Utilities and Service Systems” remains “less than significant.” However, for clarification, the following revision has been made to Draft IS/MND page 5.18-7, line 42:

“For these reasons, the proposed project would not result in the need to construct new water or wastewater treatment conveyance or facilities. However, during project construction, the use of portable toilets would temporarily generate a minimal amount of wastewater that would be transported to existing treatment facilities. ~~and the~~ Therefore, project-related impacts to wastewater treatment facilities would be less than significant.”

E-67 The commenter asserts that the impact analysis for CEQA criterion c on Draft IS/MND page 5.18-8 does not adequately justify a “less than significant” impact determination. The commenter notes that the CEQA checklist question relates directly to the construction of new stormwater drainage facilities and subsequent environmental effects that could result from the construction of such facilities. Therefore, the commenter asserts that because the proposed project would not require the construction of new stormwater facilities or the expansion of existing stormwater facilities, the impact determination should be revised to “no impact.”

The proposed project would not interfere with the existing storm drain system, nor would it create a need to construct new stormwater drainage facilities. The 0.01029 acres of new impervious surfaces associated with the proposed project would be the result of the installation of numerous poles, vaults, etc. spanning the entire project alignment and therefore would not present the potential to overwhelm existing stormwater drainage facilities at one location. The impact determination under CEQA criterion c in Chapter 5.18, “Utilities and Service Systems” has been revised to “no impact.” The text on Draft IS/MND page 5.18-8, line 39, has been revised as follows:

“The project components would not increase land use intensities to require the installation of stormwater drainage facilities, and ~~the impact would be less than significant~~ there would be no impacts to existing stormwater drainage facilities, nor would there be a need to construct new stormwater drainage facilities.

Significance: ~~Less than Significant~~ No Impact”

E-68 The commenter states that the Draft IS/MND, page 5.18-9, does not allow an option should the material be considered hazardous. The commenter suggests edits that have been incorporated into the text as shown below, that allow for flexibility should the applicant need to find another appropriate hazardous waste facility.

“This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the City of San Diego’s Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. Should the material be considered hazardous, SDG&E will dispose of the material at another site, consistent with applicable laws/regulations. The impact would be less than significant.”

E-69 Regarding Draft IS/MND page 6-2, the commenter requests that any disputes be resolved with a third-party monitor, if available, at the field level to the extent feasible. The text beginning on Draft IS/MND page 6-2, line 33, has been revised as follows:

“Disputes and complaints should be resolved at the field level to the extent feasible. If disputes and complaints cannot be resolved in the field, they shall be directed to the CPUC-designated Project Manager for resolution.”

E-70 The commenter requests multiple revisions to **MM BR-2**, described on Draft IS/MND page 6-6, including clarifying that the demarcation of work area boundaries would occur prior to use at each individual site rather than marking all work areas at one time. The commenter also requests that **MM BR-2** be refined to allow for secondary containment when refueling in areas less than 50 feet from aquatic resources, because a setback of 50 feet may not always be feasible due to the proximity of some workspaces to existing resources.

Due to the highly sensitive nature of San Dieguito Lagoon and Los Peñasquitos Lagoon, and to maintain consistency with SDG&E's "Best Management Practices Manual for Water Quality Construction," included as Attachment 4-8B of the PEA, which states that, "Fuel storage and fueling areas should be located away from storm drain inlets, drainage systems, watercourses, and water bodies," **MM BR-2** will maintain a minimum 50-foot buffer between aquatic features and equipment fueling areas. The 50-foot setback does not interfere with the potential to fuel vehicles and equipment within staging areas that are located more than 50 feet from these lagoon areas. **MM HAZ-1** has been updated to clarify that if an accidental spill or fluid leak occurs at any time during project construction, including in locations within 50 feet of aquatic resources in unanticipated circumstances such as equipment malfunction, secondary containment strategies may be utilized to contain the spill. Please see the response to Comment E-71 for complete revisions to **MM HAZ-1**.

E-71 Regarding Draft IS/MND page 6-7, the commenter requests that a requirement for project personnel to receive adequate training for safe evacuation be incorporated into the WEAP, and that the worker safety and evacuation training included as part of **MM HAZ-1** in the Draft IS/MND should instead be incorporated into the Worker Training Program required per **MM BR-3**.

Additionally, the commenter asserts that the informational handouts and booklets required per **MM BR-3** and described on Draft IS/MND page 6-7 are not effective because they tend to be disposed of and requests instead that training materials be distributed to crew supervisors, monitors, and the SDG&E Field Construction Administrator, as well as made available in construction trailer(s). The commenter states that training information would be reinforced during tailboard meetings, and requests that **MM BR-3** be revised to reflect this strategy.

The Worker Environmental Training program has been revised to include a safety training module that would explain, among other things, safe evacuation procedures. This module has been incorporated into **MM HAZ-1**, which also reflects other revisions described in the responses to Comment E-70 and Comment E-81. **MM HAZ-1** has been revised as follows:

“MM HAZ-1: Hazardous Materials Waste Management Plan / Emergency Spill and Evacuation Training. Prior to construction, the applicant shall prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. The plan shall include the following requirements and procedures:

1. The Worker Training Program (see **MM BR-3**) would include training requirements for construction workers ~~such as~~ in appropriate work practices, ~~including~~ and spill prevention and response measures. Additional training for those performing excavation activities shall be required and shall include training on types of contamination and contaminants (e.g., petroleum hydrocarbons, asbestos, and hazardous materials as defined by the California HSC) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Training would also entail safe evacuation, which could be required due to an unanticipated major spill or other emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the affected work site and specified, approved evacuation route(s) in case of emergency. This training may be carried out as a stand-alone training module or in conjunction with the training required in **MM BR-3**.

[...] This plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.”

E-72 Draft IS/MND pages 6-8 through 6-9 describe **MM BR-5: Natural Community, Tree, and Plant Protection Plan**. The commenter requests that **MM BR-5** be revised such that the measure is limited to protected trees. “Protected trees” refer to special status trees that may occur on the site and trees protected under local ordinances. **MM BR-5** has been revised to reflect this. Additionally, references to **MM BR-5** throughout the Draft IS/MND have been updated to ensure that it is referred to consistently as the “Natural Communities, Protected Tree, and Plant Protection Plan.” Furthermore, the acronym used in the Draft IS/MND to refer to this plan (NCTPP) has been removed; it is now referred to as the “Plan,” in the context of the requirements outlined in **MM BR-5**. Additional revisions to **MM BR-5**, as requested in Comments E-73 and E-74, are incorporated into **MM BR-5**, as shown below:

“MM BR-5: Natural Communities; Plant Protection Plan; Tree Protection and Preservation Plan. Natural Communities, Protected Tree, and Plant Protection Plan. To minimize project-related impacts to natural communities, protected trees, and special status plants, SDG&E shall adhere to the enhancement and restoration components of the NCTPP Natural Communities, Protected Tree, and Plant Protection Plan (Plan), including the Quality Assurance restoration protocols described in Chapter 7.2 Habitat Enhancement Measures. Additionally, prior to construction, the applicant shall ensure that special status plant surveys are conducted during appropriate phenological (blooming) periods within one year prior to

the start of construction to ensure detection. If detected, special status plants shall be flagged for avoidance. All reasonably accessible Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*) observed ~~within 50 feet of~~ directly adjacent to, ~~or within, or proximal to~~ proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction. This measure applies to Del Mar manzanita plants that could be inadvertently accessed and impacted by project activities, and does not apply to Del Mar manzanita plants that are difficult to access and that would be unlikely to be reached by construction crews or equipment. Additionally, no fewer than ~~fourteen~~ 30 days prior to the start of construction, the applicant shall develop and submit to the Plan to the CPUC, which shall include, at a minimum, the following:

- A Restoration Strategy, including a long-term monitoring strategy, for each protected tree species and special status plant species that is known to occur within or near (within 50 feet of) proposed work areas, and that therefore could be impacted by proposed project activities. If a single restoration strategy and/or long-term monitoring strategy would be effective for multiple species or groups of species, the discussion may include all applicable species, as appropriate long-term monitoring strategies should ensure successful restoration and recolonization by the intended species.
- Restoration and long-term monitoring plans for natural communities, including aquatic features and ESHAs that may experience project-related impacts.
- A Noxious and Invasive Weed Control Strategy to prevent the colonization of noxious and invasive weeds in areas disturbed by proposed project activities. The strategy shall include a procedure for washing, inspecting, documenting, and approving vehicles and equipment prior to being staged anywhere within the project area.
- Methods of communication between the applicant, the CPUC, and local qualified city arborists to discuss which protected trees, if any, may require trimming before or during project construction, and which protected trees may be subjected to construction activities within 20 feet of the Dripline Area.

Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP Plan shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, protected trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet of) of a work area, SDG&E must avoid the resource and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP Plan within ~~fourteen~~ 30 days of initial observation, for review and approval.

E-73 Draft IS/MND pages 6-8 and 6-9 describe **MM BR-5: Natural Community, Tree, and Plant Protection Plan**, which has been revised in the Final IS/MND per the recommendations described in Comment E-72 to the “Natural Communities, Protected Tree, and Plant Protection Plan” (Plan). The commenter notes that **MM BR-1** provides for ongoing surveys (at least 30 days prior to activities), and **MM BR-5** requires additional surveys to document unanticipated impacts;

the findings from these surveys will help guide appropriate restoration strategies in the Natural Community, Protected Tree, and Plan Protection Plan, a live document that may be modified as needed throughout the construction and restoration process. The commenter requests a 30-day period to have adequate time to modify the Plan to include any unanticipated qualifying resources.

Please refer to Comment E-72, which contains the revised **MM BR-5** that incorporates the changes requested in this comment, as well as the changes requested in Comment E-72 and Comment E-74.

E-74 Draft IS/MND pages 6-8 and 6-9 describe **MM BR-5: Natural Community, Tree, and Plant Protection Plan**, which has been revised in this Final IS/MND in accordance with edits described in Comment E-72. The commenter notes that staking trees that are 50 feet away from proposed project work areas draws unnecessary attention to these sensitive resources. In addition, the staking or flagging can easily blow away, creating unnecessary trash that can be difficult to collect. Because construction crews will be limited to approved workspaces, the commenter asserts that the benefit of not staking the trees outweighs the benefit of identifying them.

The requested change simplifies **MM BR-5** to ensure that biological monitors do not need to enter sensitive habitat areas to stake/flag any Del Mar manzanita individuals that are generally inaccessible. This ensures that Del Mar manzanita individuals that are not anticipated to be disturbed by project activities are not inadvertently disturbed by flagging or fencing activities. Please refer to the response to Comment E-72, which contains the revised **MM BR-5** to reflect the changes requested in this comment, as well as the changes requested in Comment E-72 and Comment E-74.”

E-75 Regarding Draft IS/MND page 6-10, the commenter requests a revision to **MM BR-6** to allow on-site avian biologist(s) to determine and delineate appropriate buffer areas for avian species without prior approval from the CPUC. The commenter states that a requirement for CPUC approval would result in “unnecessarily delay to proposed project construction,” and states that a 100-foot minimum buffer distance may be overly protective given the location and type of construction activities, in relation to topography, other sources of disturbances, and barriers protecting nests in the vicinity. **MM BR-6** has been revised as follows:

“MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections...”

...~~The nest buffer distances described above~~ Nest buffer distances may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests.

The applicant shall notify the CPUC, USFWS, and CDFW of nest buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for nest-buffer

1 reductions to special status species and raptor nests and will provide verification to the CPUC
2 of this coordination when reducing such buffers. Nest buffers for common, non-special-status
3 species shall be reduced per protocols established in the Nesting Bird Management Plan
4 (NBMP). Requests to decrease buffer distances must be submitted to the CPUC for review
5 and approval prior to implementation. Buffer distances may not be reduced to less than 100
6 feet for special status avian species. All nests with a reduced buffer shall be monitored daily
7 during construction activities until the young have fledged, the nest becomes inactive, or until
8 construction activities have concluded within the buffer area..."

9
10 **E-76** In reference to **MM CUL-2**, the commenter states that it is infeasible for a Secretary of the
11 Interior (SOI)-qualified archaeologist to constantly monitor the proposed project's ground-
12 disturbing activities and requests that instead, an archaeological monitor be employed who is
13 overseen by an SOI-qualified archaeologist.

14
15 To allow the use of an archaeological monitor under supervision of an SOI-qualified
16 archaeologist per SDG&E's request, and to accommodate additional permitting needs
17 discussed in greater detail in response to Comment A-5, and Native American involvement
18 requests discussed in greater detail in response to Comment D-2, **MM CUL-2** has been
19 revised as follows.

20
21 **"MM CUL-2: Cultural Resources Monitoring.** The applicant shall consult with all
22 interested Native American groups, per the recommendation of the Native American Heritage
23 Commission, prior to project construction. The tribes shall be notified at least 30 days prior to
24 ground-disturbing construction activities and shall be invited to voluntarily observe such
25 activities and offer any recommendations to the project's qualified archaeological monitor.

26 A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-
27 qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites
28 of significance identified within project work areas. The requirements for archaeological
29 monitoring shall be noted in construction plans for the proposed project via a Cultural
30 Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days
31 prior to the start of project activities. The Cultural Resources Monitoring Plan, at minimum,
32 shall include information regarding the location of project work areas/sites requiring cultural
33 resources monitoring, how monitoring will be conducted, and the respective roles and
34 responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified
35 archaeologist. Responsibilities for the CPUC-approved archaeological monitor shall include
36 cultural resources monitoring and implementing stop-work authority in the event of an
37 unanticipated cultural resources discovery during project activities. Responsibilities for the
38 SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to
39 recommence project activities after a stop-work order has been installed to protect potential
40 cultural resources, analysis and curation of materials, and preparation of a report detailing the
41 results of monitoring activities results report conforming to the California Office of Historic
42 Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified
43 archaeologist will determine when no further monitoring is required, such as in the event that
44 bedrock or fill material is reached.

Where cultural resources monitoring is needed at project work areas/sites within California State Parks lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.”

E-77 The commenter states that on page 6-12 of the Draft IS/MND, the “Location” requirements column for **MM CUL-2** should be clarified in the text to match what is stated in the mitigation measure. This text has been revised as follows:

“~~Entire~~ All cultural resource sites of significance identified within the project area.”

E-78 The commenter states that curation may not always be feasible in the event of landowner disagreement or tribal requests. The commenter requests that text on Draft IS/MND page 6-13 be revised to incorporate additional options in the event that curation is infeasible during construction. This text has been revised as follows:

“**MM CUL-4: Cultural Resource Discovery.** ...For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution or repatriated or redeposited in a secure location onsite if curation is infeasible. All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.”

E-79 The commenter requests that the **MM CUL-5** “Monitoring/Reporting Action” column” on Draft IS/MND pages 6-13 through 6-14 be revised to clarify the party responsible for the preparation of the Paleontological Monitoring Plan, which should also include reference to the applicant and/or its contractor(s). The commenter also requested that the revision clarify that the paleontologist is not the party responsible for verifying that the applicant has submitted the report to the CPUC.

“SDG&E and/or its contractors verify that a qualified CPUC approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by ~~Paleontological~~ the applicant and/or its contractor(s) is submitted 30 days prior to the beginning of construction work.

The paleontologist will monitor ~~construction-related~~ ground-disturbing activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be

cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.”

E-80 The commenter notes that the final sentence in the **MM CUL-5** “Effectiveness Criteria” column on Draft IS/MND page 6-13 is incomplete and suggests the following edits, which have been incorporated into the Final IS/MND:

“Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols, ~~relating to cleaning, storage, cataloging and...~~”

E-81 A Hazardous Materials and Waste Management Plan is required by existing laws and regulations and is incorporated in to the Project Description by reference, including SDG&E’s Project Design Features and Ordinary Construction Restrictions. The inclusion of this plan should be considered in the baseline for which the impacts are evaluated, and additional mitigation should not be required. It is recommended that the required evacuation training be incorporated into the WEAP training described in **MM BR-3**.

The commenter’s statement that, “The inclusion of this plan should be considered in the baseline for which the impacts are evaluated and additional mitigation should not be required,” is noted. To clarify, “plan” in the context of this mitigation measure and as applied to project activities means a document that includes applicable statutes, laws, and ordinances that regulate hazardous materials handling, use, and disposal for project activities. It could cross-reference measures that SDG&E and/or its contractors would employ to ensure requirements pertaining to hazardous materials use and disposal are carried out. This plan would also name relevant staff responsible for compliance with relevant rules and regulations.

The text of **MM HAZ-1** has been revised to reflect revisions made in response to this comment and response to Comment E-71; see response to Comment E-71 for the revised text.

E-82 The commenter noted that **MM NOI-1**, as written in the Draft IS/MND, could cause conflicts, as it is possible that other agencies would require that certain construction activities occur outside of the permitted hours in the local noise ordinances. Should this occur, SDG&E will meet and confer with the appropriate local agency to obtain relief from these hours. **MM NOI-1** has been revised as follows:

“MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction:

- City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).
- City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays).

In the event that project scheduling necessitates work outside of the hours permitted under local noise ordinances, SDG&E would meet and confer with the local jurisdictions, as needed, for guidance on scheduling and managing such construction noise in compliance with Article 9.4: Noise Abatement and Control, of the City of San Diego Municipal Code.”

E-83 The commenter requests that **MM NOI-3** be revised to account for whichever threshold is higher (the local ordinance or ambient levels plus 10 A-weighted decibels) and notes that without the requested accommodation, the measure would be too restrictive. As stated on Draft IS/MND page 5.12-21, temporary noise barriers near mobile noise sources would not be feasible to implement. **MM NOI-3** has been revised as follows:

“MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the city of San Diego or Del Mar’s noise ordinance, whichever is higher. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:

- Temporarily and safely installing and maintaining absorptive noise control barriers ~~in the perimeter of construction sites and/or~~ between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers...”

E-84 Draft IS/MND Appendix C: Master Species Table lists California adolphia (*Adolphia californica*) as having a high potential to occur. This determination is based on an “occurrence 1 mile southeast of Biological Study Area (BSA) in 2008.” The commenter suggests adopting the PEA’s low potential assessment, because this species is easily detectable.

While suitable habitat is present for this species along the project alignment, especially north of Via de la Valle, such habitat is limited. The isolated occurrence 1 mile from the BSA in 2008 is limited enough to decrease the occurrence potential for California adolphia to moderate, which is consistent with the Probability of Occurrence identified in the “2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project” cited in the PEA. This revision has been incorporated into Appendix C, as well as in appropriate locations throughout the Final IS/MND.

Species	Rare Plant Rank	Habitat Description	Potential to Occur ¹
California Adolphia (<i>Adolphia californica</i>)	--/--, 2B.1, S2	Occurs in Diegan coastal sage scrub communities, chaparral, and valley and foothill grassland, especially in clay-dominant soils from 30-2,400 m. Blooms December – May.	<u>Moderate</u> : There is suitable habitat for this species north of Via De La Valle and throughout upland areas in BSA, <u>though this habitat is limited</u> . This species was most recently detected in 2008 on the south side of

Species	Rare Plant Rank	Habitat Description	Potential to Occur ¹
			Gonzales Canyon, approximately one mile southeast of the BSA, though was not identified in surveys. The AECOM "2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project" identified California adolphia as having a moderate occurrence potential.

E-85 The commenter requests a revision to IS/MND Appendix C: Master Species Table, which lists golden-spined cereus (*Bergerocactus emoryi*) as having a high potential to occur because three occurrences had been documented 1 mile east of the proposed project between I-5 and Via de la Valle (iNaturalist). The commenter notes that "iNaturalist is an online social network of people sharing biodiversity information to help each other learn about nature," questions whether iNaturalist may serve as a reliable source, and requests that the occurrence potential for this species be considered moderate, as given in the PEA.

The commenter requests that golden-spined cereus (*Bergerocactus emoryi*) not be listed as having a high potential to occur because one referenced observance was documented in iNaturalist, a citizen-science-based application. However, the "2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project," (included in the Biotechnical Report attached to the PEA, and included as Appendix B to the Draft IS/MND), which identifies golden-spined cereus as having a moderate occurrence potential based on survey-specific parameters, states the following about the species: "Suitable habitat present throughout the BSA in upland areas west of I-5. This species is most likely to be found in upland areas of the BSA. The most recent detection for this species was in 1998 in the Torrey Pines State Natural Reserve Extension Area about 0.75 mile southwest of the BSA" (AECOM 2017a).

The occurrence threshold parameters established in the Draft IS/MND, pages 5.4-17 through 5.4-18, indicate that a species is considered to have a high potential to occur if the BSA is within the species' known geographic range, suitable habitat is present, and the species has recently (within the last 20 years) been observed within 1 mile of proposed project components. The golden-spined cereus observation described in the Biotechnical Report meets these parameters.

Draft IS/MND Appendix C: Master Species Table has been updated shown below to incorporate reference to an occurrence described in the 2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project and to remove the existing citation for iNaturalist.

Species	Rare Plant Rank	Habitat Description	Potential to Occur
Golden-spined cereus (<i>Bergerocactus emoryi</i>)	--/--, 2B.2, G2, S2	This species occurs in sandy soils primarily in maritime succulent scrub communities, but occasionally in closed cone coniferous forest, chaparral communities, and coastal scrub communities ranging from 10 to 1,300 feet in elevation. Blooms May–June.	<u>High:</u> As noted in the 2017 AECOM Rare Plant Memo Report, there is suitable habitat for this species within the proposed project area <u>and throughout upland areas of the BSA west of I-5. This species was observed approximately 0.75 miles southwest of the BSA in 1998, within Torrey Pines State Natural Reserve Extension, and there are three documented naturalist occurrence of this species approximately one mile east of the proposed project between I-5 and Via De La Valle.</u>

E-86 Draft IS/MND Appendix C: Master Species Table lists sand-loving wallflower (coast wallflower) (*Erysimum ammodendrum*) as present. The PEA had determined this species to have a low potential to occur because plants were not identified correctly during the 2014 surveys. Plants mapped by RECON in 2014 were in fruit during the 2016 fall survey. The seeds of these plants were not winged and thus are more appropriately considered *Erysimum capitatum*. The commenter recommends that the sand-loving wallflower/coast wallflower (*Erysimum ammodendrum*) species should be considered to have a low potential to occur, because the observed plants were misidentified. Revisions have been made to Appendix C, as follows, and to other applicable portions of the Draft IS/MND.

Species	Rare Plant Rank	Habitat Description	Potential to Occur ¹
Sand-loving wallflower (coast wallflower) (<i>Erysimum ammodendrum</i>)	--/--, 1B.2, G2, S2, MSCP	This perennial herb occurs in sandy substrate in maritime chaparral and coastal scrub communities below 200 feet in elevation. Blooms February–June.	Present: Approximately 175 individuals of this species were observed during 2014 surveys in coastal sage scrub and Torrey pine forest between Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension, and within Crest Canyon Park. <u>Low:</u> The approximately 175 individual plants that were observed during 2014 surveys were later determined, based on subsequent surveys during the plant's blooming season, to be sand dune wallflower/western wallflower (<i>Erysimum capitatum</i> var. <i>capitatum</i>). Sand-loving wallflower (coast wallflower) has a low occurrence potential.

E-87 The commenter requests a revision to IS/MND Appendix C: Master Species Table, which lists Burrowing Owl (*Athene cunicularia*) as having a high potential to occur. The PEA had determined Burrowing Owl to be of low occurrence potential because the species has not been

detected in the BSA and the habitat is generally not suitable. Database records show that it has been detected along the Pacific Ocean near bluffs within the Torrey Pines State Natural Reserve Extension area as recently as the winter of 2012 (eBird 2016). The commenter requests that because only wintering habitat is present and the species does not breed in or around the BSA, it should be considered to have a low potential to occur.

Because the documented 2012 Burrowing Owl (*Athene cunicularia*) occurrence fulfills the “High Potential” threshold requirements described on Draft IS/MND pages 5.4-17 through 5.4-18, Burrowing Owl will remain in the Final IS/MND analysis as having a high potential to occur. While nesting Burrowing Owls are not expected in the project area, any observed wintering Burrowing Owls should not be disturbed by project activities and should be avoided when feasible and documented by a biological monitor. If a nest is observed, proper nest buffer protocols would be established per the requirements in **MM BR-6: Avian Protection**.

Species	Status	Habitat Description	Potential to Occur ¹
Birds			
Burrowing Owl (wintering) (<i>Athene cunicularia</i>)	--/--, SSC, BCC, MSCP	Inhabits open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	<i>High:</i> This species is known to occur in San Diego County, and there is a documented eBird occurrence of this species approximately 0.75 miles west of the proposed project site in Torrey Pines State Natural Reserve.

Individuals

Comment Letter F Andrew Kahng

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Saturday, December 15, 2018 2:09 PM
To: Yanez, Silvia A.
Subject: FW: small question regarding TL674A Reconfiguration and TL666D Removal Project

Follow Up Flag: Follow up
Flag Status: Flagged

From: Andrew B. Kahng
Sent: Saturday, December 15, 2018 2:06:30 PM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: small question regarding TL674A Reconfiguration and TL666D Removal Project

Dear Project Manager --

I am a homeowner at 2695 Mira Montana Place, Del Mar, CA 92014 who recently received the December 6, 2018 "To: Interested Parties" letter from Mr. John E. Forsythe, CPUC Project Manager.

Based on what I understand from the information at <http://www.cpuc.ca.gov/environment/info/ene/delmar/delmar.html> (especially, "Project Location"), it seems that poles near my home will be either removed or topped.

Could you please tell me how the poles adjacent to Mira Montana Place, and extending southward from my home's location, will be dealt with? I.e., which poles will be removed, and which poles will be topped? I am most interested in the ~6 poles immediately to the north of, next to, and south of my home. **F-1**

Thank you very much in advance for your reply and for providing this information.

Best regards,

-- Andrew Kahng
2695 Mira Montana Place
Del Mar, CA 92014
Tel. 858-509-9098

Responses to Comment Letter F
Andrew Kahng

F-1 The commenter requests clarification regarding whether the removal or topping of poles adjacent to Mira Montana Place would occur as part of the proposed project.

As illustrated on the Detailed Project Component Map (Map 7 of 13, Appendix J, Draft IS/MND), seven poles (Poles 67–73) would be removed from service as part of the proposed project.

Comment Letter G Betty Hertel

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Monday, December 10, 2018 10:25 AM
To: Yanez, Silvia A.
Subject: FW: TL674A & TL666D Project

From: Betty Hertel
Sent: Monday, December 10, 2018 10:23:08 AM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Cc: Betty Hertel
Subject: TL674A & TL666D Project

Attn: Silvia Yanez, Project Manager

I have taken hours to decipher the proposed projects and am seeking clarification on whether the existing wires in front of our home will or will not be removed. It is not entirely clear from the information contained in the proposal.

G-1

We reside at 13662 Mango Drive(parcel # 300-384-37-00) and there is an aging electrical pole on the southeast corner section of the property. It is fairly close to KOP 5 Viewpoint shown in the report. Being the manager of this project I am sure you could easily identify this location and know if the existing wires are to be removed or will remain.

G-2

I appreciate your help in identifying the potential impact the project will bring.
Thank you.

Sincerely,
Betty Hertel
bettyhertel@gmail.com
(858) 481-1000

Responses to Comment Letter G
Betty Hertel

G-1 The commenter requests clarification regarding whether existing wires in front of her home would be removed as part of the proposed project.

Appendix J, in the Draft IS/MND contains a series of maps illustrating detailed project components, including the removal of poles and 69 kV overhead wiring.

G-2 The commenter states that an aging electrical pole is situated near key observation point (KOP) #5 in the Draft IS/MND, and inquires whether this pole and wires would be removed as part of the proposed project.

See response to G-1 above. As illustrated in the Detailed Project Component Maps (Maps 6 and 7 of 13, Appendix J, Draft IS/MND), two poles (Poles 65 and 66) would be topped and seven poles (Poles 67–73) and the 69 kV overhead line would be removed from service as part of the proposed project.

Comment Letter H Kevin Patrick

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Friday, December 7, 2018 9:33 AM
To: Yanez, Silvia A.
Subject: FW: TL674A Comment
Attachments: Map 8 TL674A.png

Follow Up Flag: Follow up
Flag Status: Flagged

From: kevin patrick
Sent: Friday, December 07, 2018 9:30:36 AM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: TL674A Comment

Dear Ms. Yanez:

I am writing about this project, and specifically with a question about what is included in Map 8 of the materials that describe it. My property at 12963 Via Latina, Del Mar, Ca, (and a second lot that I own behind that address) directly abuts the power lines and poles that will be removed.

I have attached the Map 8 of that area and note that on that map an "Existing Footpath" or "Existing Footpath/ATV Access" is shown with blue dots going from Via Latina to the base of pole 77.

I have owned and lived on this property since 1988 and can assure you that there is NOT an Existing Footpath or ATV access to the area where that pole is located. The blue dots are on a very steep hillside and sandstone bluff that goes up behind my house.

H-1

I just wanted to make sure that you were aware of this if for some reason the project engineers were counting on access to that poll via that "path" as it does not exist. Long Boat Way and Long Boat Cove roads would be the logical access.

I would appreciate it if you would acknowledge receipt of this note.

H-2

Thanks,

Kevin Patrick
12963 Via Latina
Del Mar, Ca
858.663.0531

Responses to Comment Letter H
Kevin Patrick

H-1 The commenter indicates that the “Existing Footpath” or “Existing Footpath/ATV Access” from Via Latina to the base of Pole 77, as shown in Map 8 of 13, Appendix J, Draft IS/MND, does not exist.

As outlined in the Draft IS/MND Chapter 4.0, “Project Description,” page 4-30, “the various road types are intended to allow construction crews and their equipment access to pole locations where removal or topping work is planned. SDG&E may determine that smoothing or refreshing of access road surfaces and/or vegetation clearance along access ways may be necessary to ensure safe conveyance prior to use.”

The Draft IS/MND (Table 4-7 on page 4-31) states that “Existing ATV Roads” may necessitate vegetation clearing/removal, in contrast to “Existing Footpaths” which are not likely to require preparation work or restoration because existing footpaths are mostly grassy and relatively flat areas.

The applicant confirms it would utilize the “Existing Footpath/ATV Access” to remove Pole 77 and 69 kV overhead wiring. The applicant acknowledges that some vegetation clearance and removal for access may be required, consistent with the characterization of Existing ATV Roads in the Draft IS/MND.

H-2 The commenter requests that the CPUC acknowledge receipt of these comments.

The CPUC acknowledges receipt of this comment.

Comment Letter I
Maali Mohsen

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Wednesday, December 26, 2018 2:39 PM
To: Yanez, Silvia A.
Subject: FW: TL674A and TL666D
Attachments: Scan 2018-12-26 13.53.57.pdf; Scan 2018-12-26 13.57.15.pdf

From: Mohsen Maali
Sent: Wednesday, December 26, 2018 2:37:02 PM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: TL674A and TL666D

Hi;

It appears that SDG&E is removing the 69 kv from overhead but not the 12 kv lines from the bridge toward Jimmy Durante Blvd. Why if they are moving the 69 kv underground, don't they do the 12 kv, too?

I-1

Thanks

Responses to Comment Letter I
Maali Mohsen

I-1 The commenter inquired if existing 12 kV lines from the bridge toward Jimmy Durante Boulevard would be removed.

As illustrated in the Detailed Project Component Map, Map 3 of 13, in Appendix J of the Draft IS/MND, the 69 kV overhead line would be removed from service and the 12 kV overhead line would be retained.

References

- AECOM. 2017a. Rare Plant Memo Report for the SDG&E Company TL674A Reconfiguration & TL666D Removal Project.
- AECOM. 2017b. Biological Technical Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project.
- eBird. 2018. An Online Database of Bird Distribution and Abundance. Ithaca, New York. <http://www.ebird.org> . Accessed January 5, 2018.
- Cal Parks. 1984. San Diego Coastal State Park System General Plan. Volume B: Torrey Pines State Beach and State Reserve. https://www.parks.ca.gov/pages/21299/files/ar_630_1569.pdf . Accessed February 15, 2019.
- Foglia, Shannon, Theodore G. Cooley, and Monica Mello. 2017. Cultural Resources Survey Report for the Proposed San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project, San Diego County, California. Prepared for San Diego Gas & Electric Company. August.

8.0 Other Revisions to IS/MND

This section includes revisions identified by the California Public Utilities Commission (CPUC) as needed to clarify the Draft Initial Study/Mitigated Negative Declaration (IS/MND). None of these revisions result in new or more severe environmental impacts. All revision page numbers and table references described below refer to the respective references in the Draft IS/MND document.

Figure Updates

To ensure consistency with commenter-requested changes made to the Draft IS/MND's text, figures, and appendices, updates have been incorporated into the following additional project figures:

- Figure 5.12-1: Noise-Sensitive Receptors within 1,000 Feet of the Proposed Project Vicinity
- Figure 5.14-1: Public Services near the Proposed Project Vicinity

These updated figures have been inserted into the Final IS/MND.

Text Updates

pp. i through xiv

The Table of Contents and Acronyms and Abbreviations list have been updated to reflect the changes described in this section, as well as changes incorporated into the document as a response to a public comment. Revisions to the Table of Contents and the Acronyms and Abbreviations list are indicated and in ~~strikethrough~~ and underline.

pp. 1-1

Page 1-1 of the Draft IS/MND has been revised to reflect an updated point of contact for the project.

Contact: ~~Stacie Atkinson~~ Ms. Elizabeth Beaver, Regulatory Affairs
(858) 654-6471 or satkinson@semprautilities.com
(858) 654-1787 or ebeaver@semprautilities.com

pp. 1-2

Page 1-2 of the Draft IS/MND has been revised to clarify the geographic setting of the project utility infrastructure and additional work activities.

The project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity of TL6973.

[...]

SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito and Los Peñasquitos lagoons.

pp. 1-3 through 1-4

Pages 1-3 through 1-4 of the Draft IS/MND have been revised to clarify additional potential project approvals in Table 1-1.

Table 1-1 Potential Project Approvals

Permit/Approval	Agency	Requirement
<u>Archaeological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Archaeological Investigation/Collections on State Parks land</u>
<u>Paleontological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Paleontological Investigation/Collections on State Parks land</u>

The following paragraph has been added to Section 1.4, “Environmental Determination” to describe the Draft IS/MND public review process and the new chapters included in this Final IS/MND.

On December 6, 2018, the CPUC circulated the Draft IS/MND for the TL674A Reconfiguration and TL666D Removal Project for public review in compliance with CEQA and CPUC Rule 17.1. The Draft IS/MND was also filed with the State Clearinghouse on December 6, 2018, initiating a 30-day public review period. Written comments from two public agencies, one tribal organization, the applicant, and four residents were received during the public review period. Following closure of the public review period on January 7, 2019, the CPUC prepared responses to comments received, and the IS/MND was revised, as appropriate to reflect these comments. The comments and associated responses are presented in Chapter 7.0 of this document. Additional revisions made to the IS/MND are presented in Chapter 8.0.

pp 1-5

Page 1-5 of the Draft IS/MND has been revised to list **MM GEN-1**, for consistency with Table 6-1 of the Mitigation Monitoring and Reporting Plan (MMRP). **MM GEN-1** was included in Chapter 6.0, “Mitigation Monitoring and Reporting Plan,” of the Draft IS/MND, but was erroneously omitted from Chapter 1.0, “Mitigated Negative Declaration”; therefore, insertion of **MM GEN-1** does not trigger recirculation of the IS/MND.

MM GEN-1: Implementation of All APMs. The applicant shall implement all APMs as stated in this environmental document, except in cases where specific APMs were superseded by mitigation measures. The APMs shall be incorporated into the Mitigation, Monitoring, and Reporting Plan.

pp. 1-5 through 1-14

Some public comments necessitated minor revisions to existing mitigation measures from the Draft IS/MND. Pages 1-5 through 1-14 of the Draft IS/MND describe those mitigation measures. Where changes have been made, mitigation measures described in these pages have been updated to reflect their

final text. Final text revisions to mitigation measures have also been incorporated into Chapter 5.0, “Environmental Setting and Impacts,” and Chapter 6.0, “Mitigation Monitoring and Reporting Plan.”

pp. 1-10

APM-BIO-09 has been removed from page 1-10 of the Draft IS/MND, as this portion of the document is intended to list only mitigation measures. All APMs that are incorporated as part of the proposed project, including APM BIO-09, are described in Table 4-9, and in Chapter 6.0 “Mitigation Monitoring and Reporting Plan.”

~~**APM-BIO-09:** Prior to construction, a habitat survey for potential bat roosts that may be impacted by construction activities will be conducted. During the survey, potential roost sites will be searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. Up to two weeks prior to construction, a qualified biologist will conduct bat surveys at roost sites identified as potentially active from signs of bat use identified during the survey. If bats are detected, SDG&E will avoid conducting construction activities that may directly impact the active roost site. If an active maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31).~~

pp. 3-1

Page 3-1 of the Draft IS/MND has been revised to reflect additional project activities that would occur at the existing Del Mar Substation.

The proposed project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity associated with TL6973.

pp. 3-3 through 3-4

Pages 3-3 through 3-4 of the Draft IS/MND have been revised to reflect the CEQA Guidelines Update, which became effective on December 28, 2018, after publication of the Draft IS/MND for the TL674A Reconfiguration and TL666D Removal Project. Refer to Chapter 3.0, “Introduction to the Initial Study,” for all revisions pertaining to the CEQA Guidelines Update.

pp. 3-4

Page 3-4 of the Draft IS/MND has been amended to clarify why revisions to the Draft IS/MND do not require recirculation.

3.2.5 Revisions to the Draft IS/MND and Why Recirculation is not Required

On February 5, 2019, the Applicant submitted to the CPUC an email request to include supplemental information related to removal and replacement of a circuit breaker within the existing Del Mar Substation. According to the applicant, this work may be required in order to accommodate increased ampacity associated with the new TL6973 segment that would be established as part of the proposed

project. Details related to the potential circuit breaker removal and replacement work are included as text revisions to the Draft IS/MND in Chapter 4.0, "Project Description," Sections 4.5.2 and 4.6. Text revisions have also been incorporated in the relevant environmental analyses (see specifically Sections 5.3, "Air Quality"; 5.6 "Geology and Soils"; 5.7, "Greenhouse Gases"; 5.8 "Hazards and Hazardous Materials"; 5.12, "Noise"; 5.16, "Transportation and Traffic"; and 5.19, "Mandatory Findings of Significance") to sufficiently cover any potential environmental effects associated with the circuit breaker removal and replacement work as a component of the overall project evaluated in this IS.

Section 15073.5 of the State CEQA Guidelines requires recirculation of a Negative Declaration when the document must be "substantially revised" after public notice of its availability has previously been given pursuant to Guidelines Section 15072, but prior to its adoption. A "substantial revision" as defined in Guidelines Sections 15073.5(b) entails:

- (1) [identification of] a new, avoidable significant effect and mitigation measures or project revisions [that] must be added [to the Negative Declaration] in order to reduce the effect to insignificance; or
- (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant levels and new measures or revisions must be required.

Recirculation is not required pursuant to CEQA Guidelines Section 15073(c) under the following circumstances: (1) mitigation measures are replaced with equal or more effective mitigation measures; (2) new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration, that are not new or avoidable significant effects; (3) measures or conditions of approval are added after the circulation of the negative declaration that are not required by CEQA, that do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect; and (4) new information is added to the negative declaration that merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The current revisions and clarifications to the proposed project do not amount to "substantial revisions" because no new avoidable effect has been identified resulting from the circuit breaker removal and replacement work described in the text revisions. The potential activities at the Del Mar Substation would not result in any new significant impacts in the Draft IS/MND, nor would these changes increase the severity of any of the project's less-than-significant impacts identified in this Draft IS/MND. Mitigation measures identified in the IS/MND would continue to be required in order to reduce or avoid the less-than-significant environmental impacts of the project, and the additional work incorporated through revisions to this IS/MND would not eliminate the need to implement any of the mitigation measures identified in the Draft IS/MND or necessitate any substantial revisions. Finally, no new or modified measures would be required in order to mitigate environmental impacts that may be associated with the circuit breaker removal and replacement at the Del Mar Substation because no significant impacts or impacts of greater severity would occur if this additional project

component were implemented as described in text revisions in Chapters 4.0, “Project Description” and 5.0, “Environmental Setting and Impacts.”

pp. 4-1 through 4-39

SDG&E’s comments on the Draft IS/MND requested updates to project components based on current engineering design. To ensure that all project components were up to date, CPUC submitted Data Request #4 to SDG&E on February 5, 2019. Data Request #4 requested that SDG&E provide additional clarifying information regarding the following project components. Where necessary, the Final IS/MND has been updated to reflect this information.

pp. 4-1

Connecting TL674A/6973 to the Del Mar Substation could increase ampacity¹ through and may necessitate possible removal and replacement of, an existing circuit breaker located within the substation.

pp. 4-1

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pp. 4-2

The main ~~activity~~ activities associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the existing Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in the city of San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in the city of San Diego) and the potential replacement of an existing circuit breaker on substation property.

pp. 4-8

The proposed project may also require removal and replacement of a circuit breaker at the Del Mar Substation to accommodate ampacity of TL6973D, which would have a higher voltage rating (and would be renamed TL6973) as part of the project.

pp. 4-18

Circuit Breaker Removal and Replacement

Circuit breakers safely control the flow of energy at all voltage levels across a grid by switching electrical currents on and off through the use of mechanical switching devices. When switched to an open position, breakers use insulation to cut currents immediately. When switched to a closed position, breakers ensure optimal current flow. Types of circuit breakers differ based on the method used to extinguish electrical arcs and interrupt current. The four most common types of breakers use air, oil, sodium hexafluoride (SF₆) or vacuum.

A total of eight 69-kV and 14 12-kV circuit breakers, transformers, switch gears, and other equipment are located at the Del Mar Substation, an approximately 48,520-square-foot outdoor facility enclosed by perimeter fencing underlain by a concrete pad. Since filing the project application and Proponent's Environmental Assessment (PEA) (SDG&E 2017) with the CPUC in June 2017, SDG&E has identified a possible need to replace one existing oil-filled circuit breaker, installed in 1990, in order to accommodate increased ampacity associated with TL6973, where it would feed into the substation as part of the proposed project. The breaker subject to possible removal is located along the substation's northern edge, about 60 feet east of its existing control building. According to the applicant, the removal of TL666D and connection of TL6974D with a higher voltage rating provides opportunity to modernize the breaker and associated hardware to current design standards, which specify use of SF₆ breakers.

SDG&E would prepare a detailed engineering review of the current substation foundation to determine whether the foundation would be adequate to support the new breaker. If the original foundation is not adequate to support the new circuit breaker, a new foundation would be designed and constructed. To commission the new circuit breaker, wiring within the boundary of the substation would be modified and/or replaced, as needed. If construction work were required, the replacement activities would occur within the existing substation fence line. (See Sections 4.6.1, "Construction Workforce and Equipment"; 4.6.10, "Access;" 4.7.4, "Circuit Breaker Removal and Replacement"; and 4.8, "Schedule" for additional information relating to circuit breaker removal/replacement construction activities.)

pp. 4-25

The following rows have been revised in Table 4-4 (in alphabetical order):

Table 4-4 Construction Equipment Type and Use

Equipment Type	Equipment Use
Dump/Hall Truck	Transporting excavated materials and importing backfill and debris disposal
Forklift	Delivery and disposal of circuit breaker equipment
Loader	Tractor with front bucket for moving materials
Trencher/Ditch Witch	Excavating trenches
Water Truck	Suppressing dust Non-potable water transport for dust suppression

pp. 4-31

The following row has been inserted into Table 4-7:

Table 4-7 Road Access Characteristics

Type of Road	Description	Width (in feet)	Length (in feet)	Area (in acres)
Paved, public roadway characterized as two-lane Community Collector, with continuous turning lane in project area.	Access to Del Mar Substation provided from private driveway off of Via de la Valle	N/A	N/A	N/A

Vehicle access to the Del Mar Substation would be from the substation's existing private driveway that leads from Via de la Valle. At the beginning of the workday, crew members would typically meet at one of the proposed project's staging areas/fly yards and leave personal vehicles parked at these locations. From there, crew trucks and other vehicles would travel to and park within the existing substation. Some temporary parking south of the substation along Via de la Valle may be required, depending on the construction activities occurring on a particular day. Additional temporary parking (outside of the substation parking lot) would allow for maneuvering of vehicles, equipment, and material deliveries, including during peak construction periods. The applicant does not anticipate a need for street parking on the west side of the substation.

pp. 4-38

4.7.4 Circuit Breaker Removal and Replacement

While the actual number and type of vehicles required for circuit breaker removal and replacement phase of the proposed project would vary depending on the construction activities occurring each day, the common types anticipated for the work are presented in Table 4-7(b). It is anticipated that a forklift would be used to remove the existing circuit breaker and place the new breaker into position. The forklift would operate within the fenced portion of the substation during replacement work. Nighttime work is not anticipated during this phase of the proposed project. Anticipated work hours would be consistent with the remainder of the proposed project and, unless dictated otherwise by permit conditions, would comply with applicable local noise ordinances regarding nighttime noise levels.

The circuit breaker and associated hardware would be removed from the substation site and then taken to an existing SDG&E yard. If possible, parts would be separated to serve as emergency replacement parts for other equipment currently in service. The remaining parts would be brought to a local contracted middle scrap company for disposal. SDG&E's best management practices would be implemented as applicable during this process.

4.7.4 4.7.5 Clean Up and Post-Construction Restoration

pp. 4-39

The following rows have been inserted (after C738 Conversion) into Table 4-8:

Table 4-8 Construction Schedule by Activity, Duration and Project Component

Project Component, Activity	Duration (months)	Number of Crew
<u>Circuit Breaker Removal and Replacement</u>		
<u>Below-grade construction (circuit breaker removal, foundation system, conduit from TL673)</u>	<u>1.75</u>	<u>N/A</u>
<u>Above-grade construction (circuit breaker installation)</u>	<u>2.0</u>	<u>N/A</u>

pp. 4-39

The circuit breaker replacement process would be initiated after the TL674A Reconfiguration is complete. As a result, it would overlap with the TL666D Removal, C510 Conversion, and C738 Conversion.

pp. 5.3-6

Page 5.3-6 of the Draft IS/MND has been revised to clarify that an educational learning center in the project area is identified as an additional sensitive receptor. Further, the substation equipment removal and replacement activities has been incorporated.

For the purposes of this analysis, sensitive receptors in the project area consist of residential uses (single- and multi-family housing), schools, educational learning centers, and parks and recreational areas.

[...]

Implementation of the proposed project would result in reconfiguration of the local electrical network in which high-wire overland distribution lines would be replaced with circuitry underground and ancillary substation equipment would be removed and replaced to ensure proper network functionality. The physical changes to the network resulting from the proposed project address system reliability and would not alter or increase the network's current capacity or electrical throughput. ~~As such, the proposed project's occasional maintenance and repair needs would constitute the operational phase with regard to assessing air quality impacts.~~

pp. 5.3-7

The following row has been inserted (above row "All") into Table 5.3-4.

Table 5.3-4 Proposed Project Nearest Sensitive Receptors

Project Component and Activity	Equipment and Vehicle Use During Construction	Approx. Duration (months)	Nearest Sensitive Receptor (feet approx.)	Receptor Type ^(a)
<u>Circuit Breaker Removal Replacement, Del Mar Substation</u>				
<u>Circuit breaker removal, potential foundation work, debris removal/ off-haul, replacement breaker installation</u>	<u>Loaders, trencher, forklifts, Jackhammer, Dump/Haul Truck</u>	<u>3.75</u>	<u>228</u>	<u>Therapeutic Learning Center</u>

pp. 5.3-15 through 5.3-16

Pages 5.3-15 through 5.3-16 of the Draft IS/MND have been amended to clarify that the revisions made to the CalEEMod reflect overall emissions, including outputs from anticipated circuit breaker removal and replacement activities, and to clarify that maintenance activities would not involve the use of helicopters. Additionally, revisions have been incorporated that accurately clarify the approximate percentage decrease in PM_{2.5} and PM₁₀ emissions (accounting for Table 5.3-8 and 5.3-9 revisions) that would result from incorporation of project APMs.

The model calculates the maximum daily emissions for a range of pollutants. The CalEEMod inputs and outputs are provided in an air quality emissions report that was prepared for the proposed project, as revised to reflect overall emissions, including outputs from anticipated circuit breaker removal and replacement activities (Appendix A).

[...]

As shown in Table 5.3-9, implementation of air quality APMs would affect the PM_{2.5} and PM₁₀ emissions. Incorporation of APMs would result in an approximate 28 21 percent decrease in PM_{2.5} with control measures incorporated into construction; APMs would reduce an approximate additional 46 53 percent of projected PM₁₀ emissions over an uncontrolled scenario. Neither uncontrolled nor controlled emission rates from project construction would exceed applicable SDAPCD thresholds, and therefore, the project would not violate any air quality standard or contribute substantially to existing or projected air quality violations.

The vehicle trips and maintenance activities associated with the proposed project would be similar to the level of vehicle trips and maintenance activities prior to construction of the proposed project.

Further, ~~it~~ maintenance activities would not involve the use of helicopters.

pp. xiii, 5.4-40 through 5.4-41, and Table 6-1

MM BR-5: Natural Communities; Plant Protection Plan; Tree Protection and Preservation Plan (NCTPP), as described on pages 5.4-40 through 5.4-41 and in Table 6-1 of the Draft IS/MND, have been revised per Comment E-72 to MM BR-5: Natural Communities, Protected Tree, and Plant Protection Plan.

Throughout the Final IS/MND, this is no longer referred to as the NCTPP, and is instead referred to contextually as the “Plan.” Updates have been made throughout the document wherever applicable (Table 6-1 and Chapter 1.0, “Mitigated Negative Declaration”) and to page xiii in the Draft IS/MND Acronym List.

pp. 5.5-15

The Regulatory Setting section does not discuss CPUC preemptive authority over local regulatory agencies with respect to transmission projects. Page 5.5-15 of the Draft IS/MND has been revised to incorporate this condition with respect to local regulations.

Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to historic preservation, archaeological, and cultural resources within the project area and vicinity for informational purposes.

pp. 5.7-7

Criterion “b” in Table 5.7-4 on page 5.7-7 of the Draft IS/MND has been revised to “Less Than Significant Impact” to reflect consistency with the analysis and level of determination.

Table 5.7-4 Greenhouse Gases Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

pp. 5.7-8

Table 5.7-5 and subsequent text on page 5.7-8 of the Draft IS/MND has been revised to account for GHG emissions as part of the removal and replacement activities at the Del Mar Substation.

Table 5.7-5 Greenhouse Gas Construction Emissions

Category	GHG Emissions (MT)		
	CO ₂	CH ₄	N ₂ O
Construction Equipment and Vehicles	899.66	0.16	0.00
Helicopter Use ^(a)	73.50	0.00	0.00
<u>Substation Modifications</u>	<u>23.31</u>	<u>0.01</u>	<u>0.00</u>
Total Construction Emissions	973.16 <u>977.47</u>	0.16 <u>0.17</u>	0.00
Global Warming Potential	1	21	310
CO ₂ e	973.16 <u>996.47</u>	3.44 <u>3.57</u>	0.00
Total CO ₂ e	976.6 <u>1,000.04</u>		
Amortized Construction Emissions (Amortized over 30 years)	32.55 <u>33.33</u>		
<u>Annual Fugitive SF₆ Emissions^(b)</u>	<u>1.79</u>		
<u>Total Annual CO₂e</u>	<u>35.12</u>		
SCAQMD Significance Threshold	10,000		
SCAQMD Significance Threshold Exceeded?	No		

Notes:

^(a) See Appendix E, *Greenhouse Gas Helicopter Emission Report*, for helicopter greenhouse gas emission estimates during construction.

^(b) The replacement of an existing circuit breaker (which is needed to meet new SDG&E design standards) at the Del Mar Substation will contain approximately 33 pounds of SF₆, with a maximum annual leak rate of 0.5 percent.

Key:

CH₄ = methane

Table 5.7-5 Greenhouse Gas Construction Emissions

CO_{2e} = carbon dioxide equivalent
GHG = greenhouse gas
MT = metric tons
N₂O = nitrous oxide
SCAQMD = South Coast Air Quality Management District
SDG&E = San Diego Gas and Electric Company
SF₆ = sulfur hexafluoride

Construction activities associated with the removal of the existing oil-filled circuit breaker and replacement with a modern SF₆ breaker is accounted for as part of the various project activities that could generate GHG and contribute to climate change.

[...]

These activities would ~~not generate an~~ represent a substantial increase in GHG emissions when compared to ~~their current levels~~ emissions resulting from existing operation and maintenance activities; therefore, GHG emissions during the proposed project's operation and maintenance activities would be less than significant.

pp. 5.8-7

On page 5.8-7 of the Draft IS/MND, Table 5.8-3 has been updated to correct the names of two schools.

Table 5.8-3 Schools within 0.25 Miles of the Proposed Project

School	Address	Approximate Distance
Fusion Academy Solana Beach	512 Via De La Valle #201, Solana Beach	1,250 ft. west of western terminus, TL674A Reconfiguration
Therapeutic Literacy Learning Center	990 Highland Dr., Solana Beach	100 ft. west of western terminus, TL674A Reconfiguration
Del Mar Hills Elementary School ^(a)	14085 Mango Dr., Del Mar	adjacent TL666 Removal
Del Mar Hills Nursery School	13692 Mango Dr., Del Mar	within 100 ft. west of TL666 Removal
Del Mar Heights Elementary School ^(a)	13555 Boquita Dr., Del Mar	400 ft. west of TL666 Removal
Torrey Pines Montessori Preschool	2586 Carmel Valley Rd., Del Mar	within 100 ft. west of TL666 Removal
Brighter Future Preschool <u>and</u> Childhood Development Center	3422 Tripp Ct, San Diego	300 ft. southwest of TL666 Removal
After School Learning Tree	11525 Sorrento Valley Rd. #A, San Diego	1,000 ft. south of southern terminus, TL666D Removal

Sources: SanGIS 2016; Google 2018; Great Schools 2018

Note:

^(a) Public Schools

Key:

Dr. = Drive

Rd. = Road

pp. 5.8-18

Page 5.8-18 of the Draft IS/MND has been revised to clarify how the old circuit breaker would be handled and disposed during removal and replacement.

SDG&E or its contractors would remove an oil circuit breaker from the Del Mar Substation and taken to an existing yard. As applicable, parts would be separated to serve as emergency replacement components for other equipment currently in service. The remaining parts would then be sent to a local contracted metal scrap company for disposal. SDG&E's best management practices would be implemented, as applicable, during this work phase.

pp. 5.10-3

Page 5.10-3 of the Draft IS/MND discusses CPUC General Order No. 131-D as a state regulation pertaining to the project. However, because this regulation is relevant within a local regulatory context, it has been moved as an introduction to the Regional and Local Regulatory Setting section in the Final IS/MND.

California Public Utilities Commission General Order No.131-D

~~The California Public Utilities Commission (CPUC) has sole and exclusive jurisdiction over the siting and design of the proposed project; therefore, CPUC projects are exempt from local land use regulations and discretionary permitting¹. However, General Order No. 131-D, Section XIV.B states: "the public utility shall consult with local agencies regarding land use matters." Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. The public utility, under jurisdiction of the CPUC, is required to obtain any non-discretionary local permits (CPUC 1995).~~

Regional and Local

In accordance with California Public Utilities Commission General Order No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the proposed project; therefore, CPUC projects are exempt from local land use regulations and discretionary permitting.¹ However, General Order No. 131-D, Section XIV.B states: "the public utility shall consult with local agencies regarding land use matters." Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. The public utility, under jurisdiction of the CPUC, is required to obtain any non-discretionary local permits (CPUC 1995).

pp. 5.10-9

Page 5.10-9 of the Draft IS/MND has been revised as follows for consistency with the Final IS/MND's Appendix G.

If unmitigated, potential conflicts with policies presented in the ~~Analysis of Relevant Plans and Policies~~ Land Use and Planning Policy Matrix (Appendix G) could result in significant impacts on the environment.

pp. 5.11-5

The Regulatory Setting of the Draft IS/MND does not discuss CPUC preemptive authority over local regulatory agencies with respect to transmission projects. Page 5.11-5 of the Draft IS/MND has been revised to incorporate this condition with respect to local regulations. Additionally, language has been

inserted clarifying that there are no relevant local regulations pertaining to mineral resources with respect to the proposed project.

Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to mineral resources, this analysis presents local policies, ordinances, and guidelines pertinent to mineral resources within the project area and vicinity for informational purposes.

The relevant planning documents for the city of San Diego and Del Mar do not identify locally important mineral resource recovery sites that would be affected by implementing the proposed project.

pp. 5.12-3

The number and type of sensitive receptors have been updated to reflect work at the Del Mar Substation site as follows:

Within this 1,000-foot sensitive receptor area are ~~three~~ five schools, 14 residences, ~~and~~ eight parks, and one private educational facility.

pp. 5.12-4

On page 5.12-4 of the Draft IS/MND, Solano Santa Fe Elementary School has been removed from Table 5.12-2. It was identified that Solano Santa Fe Elementary School is located more than 1,000 feet from project components, and was erroneously included in the table.

Table 5.12-2 Noise-Sensitive Receptors within 1,000 Feet of Project Components

Project Component/Activity	Nearest Sensitive Receptor (feet)	Receptor
TL674A Reconfiguration		
New 69 kV Underground TL674A	355	Residence
Overhead Line to be Removed 69 kV TL674A	115	Residence
Work Area – TL674A (WA-2)	283	Solano Santa Fe Elementary School
TL674A Underground Work Area	75	Therapeutic Learning Center
TL666D Removal		
Drop Zone EL666D	107	Residence
Overhead 69 kV TL666D to be removed	Many features overlap	Peñasquitos Lagoon Open Space
Overhead 69 kV TL666D to be removed	Many features overlap	Los Peñasquitos Marsh Nature Preserve
Stringing Site TL666D SS-15	35	Residence
Stringing Site TL666D SS-16	35	Residence
Stringing Site TL666D SS-17	55	Residence

Table 5.12-2 Noise-Sensitive Receptors within 1,000 Feet of Project Components

Project Component/Activity	Nearest Sensitive Receptor (feet)	Receptor
Stringing Site TL666D SS-18	52	Residence
Stringing Site TL666D SS-2	11	Residences
Stringing Site TL666D SS-25	82	Residence
Stringing Site TL674A SS-28	295	Residence
Work Area TL666D (WA-11)	822	Surf and Turf Recreational Park
Work Area TL666D (WA-44)	41	Residence
Work Area TL666D (WA-5)	79	Residence
Work Area TL666D (WA-59)	27	Del Mar Hills Elementary School
Work Area TL666D (WA-67)	175	Del Mar Nursery School
Work Area TL666D (WA-100)	400	Brighter Future Preschool
Work Area TL666D (WA-102)	400	Child Development Center
C510 Conversion		
Existing 12kV Overhead	42	Residence
New 12 kV Underground C510	91	Residence
C738 Conversion		
Underground Work Area C738	445	Shaw Valley Open Space
Del Mar Substation		
Circuit Breaker Removal and Replacement	228	Therapeutic Learning Center
All		
Del Mar Heights Fly Yard	361	Del Mar Heights Elementary School
Pumpkin Patch Staging Yard	121	Fairbanks Ranch Country Club
Pumpkin Patch Staging Yard	123	Carmel Valley Open Space
Pumpkin Patch Staging Yard	145	Residence
Torrey Pines Fly Yard	102	Torrey Pines State Reserve
Torrey Pines Fly Yard	363	Torrey Pines State Beach
Torrey Pines Fly Yard	Features overlap	San Jacinto Wilderness

Key:
kV = kilovolt

pp. 5.12-19

The following sentence has been revised to remove a reference to the number of the most commonly used types of construction equipment presented in Table 5.12-6, because additional equipment have been added to the table that exceed the 20 originally tabulated. Furthermore, text has been inserted that appropriately identifies Del Mar Substation as a work area where the proposed circuit breaker removal and replacement activities would be a temporary source of construction noise.

Equipment that may be used to carry out project construction activities would be similar to equipment used in most public works projects. Table 5.12-6 identifies 20 of the most commonly used types of

equipment. Noise levels are measured in decibels at a reference distance of 50 feet from the source. Noise levels are conservatively presented, because the reported outputs assume that no equipment muffling, shielding/baffling, or other means of noise reduction is reflected in the data. Muffling, shielding/baffling, or other noise reduction techniques could reduce the level of noise from its source to receptor.

Construction work would occur at specific work areas, proceeding from one location to the next within one of the four utility corridors where specific construction activities have been identified. Construction would also occur at the Del Mar Substation site associated with circuit breaker removal and replacement. Each work area is considered separate to ensure that noise-generating characteristics are captured in the evaluation of potential construction noise impacts.

pp. 5.12-19, Table 5.12-6

Additional rows have been added to Table 5.12-6 that represent the types of equipment that could be in use at the Del Mar Substation for proposed circuit breaker removal and replacement work. Additional table entries are reflected by the following inserted rows:

Table 5.12-6 Typical Construction Equipment Noise Levels

Equipment Type	Maximum Noise Level at 50 feet (dBA)
Concrete Saw	90
Mower	88
Drill Rig/Truck-Mounted Augur	85
Grader	85
<u>Impact Wrench</u>	<u>85</u>
Jackhammer	85
Vacuum Truck	85
Dump Truck, Flatbed Truck	84
Crane	81
Excavator	81
Rock Drill/Rock-Drilling Equipment	81
Air Compressor	80
Backhoe	80
<u>Forklift</u>	<u>80</u>
<u>Haul/Dump Truck</u>	<u>80</u>
<u>Water Truck</u>	<u>80</u>
Wire-pulling Machine	80
<u>Loader</u>	<u>79</u>
Paver	77
Aerial Bucket Truck	75
Portable Generator	73

Source: SDG&E 2017

pp. 5.12-29

Text on page 5.12-19 of the Draft IS/MND has been revised to incorporate the construction work at Del Mar Substation into the noise analysis.

The ~~three~~ four distinctive groups of activities involve the use of mechanical tools to facilitate (1) construction and removal of overhead power lines and infrastructure; (2) converting and reconfiguring existing overhead circuitry to an underground configuration; (3) removing and replacing a circuit breaker at the Del Mar Substation; and (3 ~~4~~) noise-generating activities associated with vehicle movements, machinery, and from helicopter operations associated with power pole topping and removal in environmentally sensitive areas. These ~~three~~ four groups of construction activities contain adequate detail to evaluate the proposed project's anticipated construction noise impacts.

pp. 5.12-19

Data has been added to Table 5.12-7 to reflect additional construction equipment that would be used at the Del Mar Substation site to facilitate the proposed removal and replacement of a circuit breaker.

Table 5.12-7 Typical Eight-hour Average Noise Levels from Construction Equipment

Equipment	8-hour Noise Levels from Source (dBA)				
	50 ft.	100 ft.	200 ft.	500 ft.	1,000 ft.
Air Compressor	73	67	61	53	46
Aerial Bucket Truck	73	67	61	53	46
Backhoe	76	70	64	56	49
Crane	76	70	64	56	49
Drill Rig/Truck-Mounted Augur	78	72	66	58	51
Grader	75	69	63	55	48
Mower	75	69	63	55	48
Impact Wrench	80	74	68	62	58
Forklift	80	74	68	62	58
Haul/Dump Truck	80	74	68	62	58
Water Truck	80	74	68	62	58
Loader	79	73	67	61	57
Portable Generator	70	64	58	50	43
Rock Drill/Rock-Drilling Equipment	74	68	62	54	47
Backhoe	83	77	71	63	56
Concrete Saw	73	67	61	53	46
Crane	77	71	65	57	50
Excavator	78	72	66	58	51
Jackhammer	75	69	63	55	48
Paver	74	68	62	54	47
Dump Truck, Flatbed Truck	76	70	64	56	49
Vacuum Truck	81	75	69	61	54
Wire Pulling Machine	74	68	62	54	47

Source: FHWA 2006

Table 5.12-7 Typical Eight-hour Average Noise Levels from Construction Equipment

Equipment	8-hour Noise Levels from Source (dBA)				
	50 ft.	100 ft.	200 ft.	500 ft.	1,000 ft.

Note: Noise levels listed above are illustrative and represent the typical types of equipment that would be used for project construction. Values in dark boxes exceed the 75 dBA noise threshold at the stated distance from the source; grey shading indicates noise level is at the reported threshold.

Key:
dBA = A-weighted decibels
ft = feet

pp. 5.12-20 through 5.12-21

Text on pages 5.12-20 through 5.12-21 of the Draft IS/MND has been revised to address construction noise at the Del Mar Substation and anticipated noise effects to nearby receptors.

Circuit Breaker Removal and Replacement, Del Mar Substation

The nearest receptor to the Del Mar Substation is a residential use located upslope approximately 130 feet north from the circuit breaker removal and replacement area. To the east of the substation and downslope is an I-5 off-ramp connecting to Via De La Valle and interstitial open space. To the south is the substation's private driveway from Via De La Valle. To the west is an approximately 30-foot-wide roadway that provides access to the residents atop the hill north of the substation site. On the western side of the roadway are a mix of commercial uses, including the Therapeutic Learning Center about 228 feet southeast of the circuit breaker work area on the substation site. Construction noise would be generated by the use of equipment and machinery, such as jackhammers, loaders, forklifts, and haulers, at the substation site. This equipment would be used to remove an existing circuit breaker and to lay new concrete foundation; to remove, replace and off-haul circuit breaker unit(s); and to create a trench for underground conduit that would connect transmission/distribution lines that would feed into the substation.

Substation work could generate 8-hour average noise levels of up to 80 dBA at 50 feet from the source. Noise levels would attenuate to about 71 dBA at the nearest residential receptor to the north and to approximately 69 dBA at the property line of the Therapeutic Learning Center to the southeast. It is noted that on this site as on others, crews would not operate noisy equipment for entire workdays uninterrupted. Noise levels represent maximum levels from intermittent noise events from various noise-producing sources that are then averaged over an 8-hour period. Although construction noise would be temporary and intermittent, MM NOI-2 is identified to address receptors 50 or nearer to construction noise sources.

Moreover, MM NOI-2 has been identified for the notification of receptors within 50 feet of construction areas.

pp. 5.13-3

Page 5.13-3 of the Draft IS/MND introduces the local regulatory setting of the proposed project, with respect to population and housing. For consistency with other sections, a description of CPUC preemptive authority over local regulatory agencies for transmission projects has been inserted.

The Housing Elements of the City of San Diego and City of Del Mar General Plans were reviewed for policies applicable to the analysis of population and housing impacts of the proposed project (City San Diego 2013). The proposed project does not appear to conflict with any of the General Plan housing policies. The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to population and housing, this analysis presents local policies, ordinances, and guidelines pertinent to population and housing within the project area and vicinity for informational purposes.

pp. 5.14-2

The description of schools within 1,000 feet of the proposed project on page 5.14-2 of the Draft IS/MND has been revised. The schools located within 1,000 feet of the proposed project were identified inconsistently throughout the Draft IS/MND, and some schools located more than 1,000 feet from the proposed project were erroneously included in the environmental setting. The Final IS/MND has corrected these inconsistencies in the text, and on pages 5.12-1 and 5.14-1.

~~Three~~ Five schools are within 1,000 feet of the proposed project's utility corridors: ~~Solano-Santa Fe Elementary School~~, Del Mar Hills Elementary School, Therapeutic Learning Center, Del Mar Nursery School, Brighter Future Preschool and Child Development Center, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). ~~Solano-Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area TL674A (WA-2).~~ Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard. Therapeutic Learning Center is located approximately 75 feet west of the TL674A Underground Work Area, and is across the street from the Del Mar Substation. Del Mar Nursery School is located approximately 175 feet west of the TL666D project component (WA-67). Brighter Future Preschool and Child Development Center is located approximately 400 feet west of the TL666D project component (WA-100 and WA-102).

pp. 5.15-7

Page 5.15-7 of the Draft IS/MND introduces the local regulatory setting of the proposed project, with respect to population and housing. For consistency with other sections, a description of CPUC preemptive authority over local regulatory agencies for transmission projects has been inserted.

County and city plans, including community plans for San Diego County and the Cities of San Diego and Del Mar were reviewed for policies relevant to the proposed project and impacts as defined by the California Environmental Quality Act (CEQA). The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to recreational resources and facilities within the project area and vicinity for informational purposes.

pp. 5.15-8

Page 5.15-8, Lines 29 to 38 of the Draft IS/MND discuss APM REC-02 and a revision to APM REC-02 per SDG&E's November 20, 2017 response to CPUC's Data Request 01, dated November 9, 2017. For consistency with SDG&E's data response, corrections to APM REC-02 have been incorporated into Section 5.15, "Recreation," and Chapter 6.0, "Mitigation Monitoring and Reporting Plan."

APM REC-02 (Revised by SDG&E in response to Data Request 01 by the CPUC [SDG&E 2017c]):

Authorities representing facilities where access restrictions may occur (i.e., the California Department of Parks and Recreation and the City of San Diego) will be contacted and given advance notice of project activities no less than eight weeks prior to construction. SDG&E will also coordinate with the 22nd District Agricultural Association that manages and operates the Del Mar Horse Park no less than eight weeks prior to construction to minimize potential impacts to the facility and its users during construction.

~~APM REC-02 (Revised), as revised in response to Data Request 01 by the CPUC (SDG&E 2017c), the applicant would notify authorities and managing agencies of recreational facilities of project activities no less than eight weeks prior to construction to ensure that the facility users are duly informed of service restrictions and or disruptions.~~

pp. 5.16-9

Criterion "c" under Table 5.16-4 (Table 5.16-2 in the Final IS/MND), "Transportation and Traffic Checklist" on page 5.16-9 of the Draft IS/MND has been revised to "Less Than Significant Impact" to reflect consistency with the analysis and level of determination.

Table 5.16-2 Transportation and Traffic Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Table 5.16-2 Transportation and Traffic Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
congestion management agency for designated roads or highways?				
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Revisions to the MMRP

Pages 6-1 through 6-2 of the Draft IS/MND have been revised to reflect that the MMRP is now final.

~~This MMRP is a draft program. The CPUC will~~ has formalized this MMRP for inclusion in the Final IS/MND. ~~prior to construction, to include~~ It includes specific protocols that the applicant's designated environmental monitors and project staff (as described in Section 6.3, "Final Mitigation Monitoring and Reporting Plan") and its contractors shall adhere to prior, during, and after construction. The Final MMRP ~~will include, but not be limited to,~~ includes protocols and timelines for the following topics. The list below is not exhaustive:

[...]

A Final MMRP ~~will be~~ was prepared for the Final IS/MND that incorporates ~~any~~ the changes to the proposed project, IS/MND text, and ~~or~~ mitigation measures that ~~are~~ were made ~~as a result of~~ during public review of the Draft IS/MND and further consideration of the proposed projects by the CPUC.

A revision has been made to the "Monitoring/Reporting Action" column Table 6-1 on page 6-15 of the Draft IS/MND, for APM GEO-1. The Monitoring/Reporting Action has been revised as follows, to account for potential geological monitoring needs based on a subsequent final geotechnical investigation.

SDG&E submits final geotechnical study to CPUC prior to, and in support of, issuance of any permits necessary for project construction. Relevant geotechnical recommendations would be incorporated into final project design as feasible. If identified as necessary based on the final geotechnical study, a

1 geological monitor will monitor project activities occurring in geologically sensitive areas within
2 Torrey Pines State Natural Reserve Extension.
3

4 Furthermore, multiple revisions have been made to Table 6-1 in Chapter 6.0, “Mitigation Monitoring and
5 Reporting Plan.” The column titled “Responsible Agency” in the Draft IS/MND has been re-titled
6 “Responsible Agencies and Parties,” and additional responsible agencies and parties have been inserted
7 into that column where appropriate. Furthermore, when mitigation measures or other contents related to
8 the MMRP have been revised in response to public comments (see Chapter 7.0, “Response to
9 Comments”), those revisions have also been incorporated into Table 6-1.
10

11 **Revisions to the Draft IS/MND to Update to the Final IS/MND**

12 Throughout the document, revisions have been made to reflect that the IS/MND document is the Final
13 IS/MND. For example, footers have been changed to show “Final IS/MND” rather than “Draft IS/MND.”
14 Language that reflected the Final IS/MND would be prepared has been removed to reflect that the Final
15 IS/MND has been prepared.
16

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7.09.0 List of Preparers

A consultant team headed by Ecology and Environment, Inc. prepared this document under the direction of the California Public Utilities Commission. The preparers and reviewers of this document are indicated below.

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