

**Cleveland National Forest Power Line Replacement Projects
Notice to Proceed request #27 Data Request, Dated April 20, 2020
San Diego Gas & Electric Company Response**

On March 19, 2020, San Diego Gas & Electric Company (SDG&E) submitted its Cleveland National Forest Power Line Replacement Projects (Project) Notice to Proceed (NTP) request #27 for Phase II of Circuit (C) 440 to the California Public Utilities Commission (CPUC) for review and approval. In conjunction with that request, on April 20, 2020, the CPUC asked SDG&E to provide additional information regarding seven topics related to the final design of Phase II of C440. Below, SDG&E restates each CPUC request, followed by the company's response.

CPUC Bullet #1

The majority of C440 Phase II is on NFS lands and CPUC understands that final design of C440 Phase II is based off close coordination with the USFS. As proposed, C440 Phase II includes overhead wood-to-steel conversion, undergrounding, new intercept/intersect poles, etc.-- a combination of the Project/Proposed Action and Federal Preferred Alternative (approved project/selected alternative), and final design components. Please provide a summary of the coordination with the USFS regarding C 440 Phase II project design, including design changes from the approved project that were intended to reduce resource impacts. Additionally, please provide an explanation of pole design in relation to weather/climate in this area.

SDG&E Response to Bullet #1:

Please see the accompanying Cleveland National Forest Power Line Replacement Projects, Phase II of Circuit 440 Minor Project Refinement Memo (MPR Memo), in which SDG&E provides the additional information requested by the CPUC.

CPUC Bullet #2

Confirm specifically how final design integrates accommodation for AT&T facilities though all portions of C 440 Phase II.

SDG&E Response to Bullet #2:

After close coordination between AT&T and SDG&E, AT&T chose to not include its facilities in the underground trench package design. All poles on Phase II of C440 were designed to accommodate AT&T facilities; however, AT&T facilities will only be transferred to new poles if they are currently co-located with existing poles. Any AT&T facilities that are not currently co-located with SDG&E facilities (i.e., standalone AT&T facilities) will not be transferred as part of this Project. *See also* MPR Memo at Page 9 (*Public Services and Utilities*)

CPUC Bullet #3

Please compare the resource impacts between the staging/fly yards for this segment compared to those analyzed in the Final EIR/EIS (eg. size, quantity, resources present).

SDG&E Response to Bullet #3:

As shown in Table 1: Current Usage of Baseline Yards, many of the approved baseline yards will still be utilized for construction activities; however, they will be utilized as other types of

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work areas due to their smaller sizes, and in some cases, there are minor modifications to the final footprint. Biological, hydrological, recreational, and cultural resource impacts associated with the Notice to Proceed (NTP) #27 yards are discussed in the following paragraphs.

Table 1: Current Usage of Baseline Yards

Baseline Yard	Current Usage in NTP #27
Staging Yard 6	Red Tail Roost Staging Yard
Staging Yard 7	Construction-Only Access Road; Community/Named Access Road
Staging Yard 8	Temporary Access/Entry/Turnaround 19
Staging Yard 9	Will not be utilized
Staging Yard 10	Stringing Site 5

As shown in Table 2: Baseline and NTP Yard Comparison, all baseline yards and NTP #27 yards occur within either disturbed or developed areas. Although there is a difference in the total acreage, there will be no increase in impacts to sensitive vegetation communities nor to jurisdictional wetland or non-wetland waters. Special-status plants and special-status butterfly host plants do occur within or adjacent to NTP #27 yards (similar to the baseline yards) but impacts will be avoided to the maximum extent possible by implementing MM BIO-14 and MM BIO-16 (i.e., installing fencing or flagging near known locations) and the Special-Status Plant Species Salvage and Relocation Plan.

Table 2: Baseline and NTP Yard Comparison

Baseline Yard	Acreage	Vegetation Type	NTP #27 Yards	Acreage	Vegetation Type
Staging Yard 6	0.07	Pavement	Red Tail Roost Staging Yard ¹	0.13	Pavement
Staging Yard 7	0.05	Disturbed	Rec Barn Staging Yard	0.29	Disturbed
Staging Yard 8	0.13	Disturbed	Morris Ranch Staging Yard	0.93	Disturbed
Staging Yard 9	0.10	Disturbed	Shrine Camp Staging and Fly Yard	5.51	Disturbed
Staging Yard 10	0.03	Pavement	Air Force Staging and Fly Yard	2.37	Disturbed
Total	0.38 acre of disturbed or developed habitat		Total	9.23 acres of disturbed or developed habitat	

¹ The Red Tail Roost Staging Yard includes a portion of the baseline Staging Yard 6.

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The Shrine Camp Staging and Fly Yard as identified in NTP #27 occurs partially within United States (U.S.) Fish and Wildlife Service-designated critical habitat for Laguna Mountains skipper (*Pyrgus ruralis lagunae*) (similar to Staging Yard 8, which is a baseline yard). The Shrine Camp Staging and Fly Yard is already disturbed and contains none of the physical or biological features that are essential to the conservation of the Laguna Mountains skipper (which are defined in the Project's Biological Opinion as "primary constituent elements"). Moreover, any impacts to Laguna Mountains skipper critical habitat will be minimized to the extent feasible and in accordance with all applicable applicant-proposed measures (APMs) and mitigation measures (MMs) included in the Project's Mitigation Monitoring, Compliance, and Reporting Program, as well as Conservation Measures from the Project's Biological Opinion.

NTP #27 yards occur near or within recreational facilities in the Laguna Mountain Recreation Area similar to the baseline yards; however, as discussed in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS), access to recreational facilities will be maintained during construction. Specifically, the Pacific Crest National Scenic Trail (PCT) crosses the road leading to the Air Force Staging and Fly Yard. In addition, the Red Tail Roost Staging Yard is located within the parking lot used to access the Red-Tailed Roost Volunteer Activity Center. Traffic/safety controls (e.g., flaggers) will be established to maintain use of and access to the PCT, including stopping recreationists for short durations at safety checkpoints during construction activities until it is safe to proceed. Additionally, the Red Tail Roost Staging Yard will only be used for parking crew vehicles Monday through Friday from 7:00 a.m. to 5:00 p.m., and a section of the parking lot will remain available for visitor parking throughout the week. Some public parking will also be maintained at the Laguna Mountain Visitor Center throughout the week, excluding short-term and infrequent closures due to certain construction activities (i.e., wire stringing) for public safety.

The NTP #27 yards have full intensive pedestrian survey coverage for cultural resources. The Shrine Camp Staging and Fly Yard is located within the historic Al Bahr Shrine Camp and within a portion of the Shrine Camp Historic Recreation Residence Tract. However, as defined in the confidential cultural resource letter associated with NTP #27, the Al Bahr Shrine Camp and the Shrine Camp tract are both recommended not eligible for the National Register of Historic Places. Environmentally sensitive area fencing will be installed around any existing historic structure that is within 50 feet of the yard to ensure no impacts to the resource occurs. No other NTP #27 yards are located within 50 feet of known cultural resources.

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All of the NTP #27 yards are located within the Mount Laguna Recreation Area Operation Outdoors Historic District² and the *Ah-ha' Mut-ta-ti'e* Traditional Cultural Property (TCP)³, similar to the baseline yards. The Mount Laguna Recreation Area Operation District was documented by the USFS in 2018 and the *Ah-ha' Mut-ta-ti'e* TCP was evaluated in 2020 in support of the NTP #27 effort. Both resources were documented after the Final EIR/EIS was prepared and are addressed in the NTP #27 Cultural Resources Review.⁴ Recommendations for these yards are included in the Historic Properties Management Plan Appendix A Update for NTP #27.⁵

CPUC Bullet #4

Provide comparison maps that show the Proposed Action/ Project and the final design. Please note the undergrounded areas carried forward from the Federal Preferred Alternative.

SDG&E Response to Bullet #4:

This map is included with the Cleveland National Forest Power Line Replacement Projects, Phase II of Circuit 440 Minor Project Refinement Memo. See MPR Memo at Attachment C: Phase II of C440 Compare Map.

CPUC Bullet #5

As part of cultural submittals, extensive details were provided regarding final pole diameter, height, type, etc. Please confirm the range of diameters, height, type, etc. were in the scope of CEQA and were considered in the effects anticipated for the historic cabins and tracts, aesthetics, etc. Also, please confirm that pole diameter is covered in assumptions for permanent impacts in the Final EIR/EIS.

SDG&E Response to Bullet #5:

As shown in the previous cultural submittals, the existing pole heights range from approximately 21 to 48 feet, and the new steel pole heights will range from approximately 24.5 to 61 feet. The new pole diameters will range from approximately 11.7 to 26.9 inches (i.e., 0.98 to 2.2 feet). As discussed in Section B.3.1.10 of the Final EIR/EIS, existing poles on C440 were expected to range from 19 to 52 feet in height and the new steel poles were expected to be a maximum of 62 feet in height. The typical diameter was expected to be approximately 14 inches, but could vary. In Section B.4.4. of the Final EIR/EIS, the permanent footprint of each direct-bury steel

² *Determination of Eligibility for listing on the National Register of Historic Places for the Laguna Mountain Recreation Area Developed Recreation Facilities* (Griffith 2018) On file at the CNF Heritage Resources Library, 05025000001-R2017050240013.

³ National and California Register Traditional Cultural Property (TCP) Evaluation for *Ah-Ha' Mut-ta-ti'e* (Laguna Mountain) TCP (Ruston, et al. 2020) submitted to CNF Heritage Resources and CPUC staff on November 8, 2019 and March 16, 2020 in support of NTP #27.

⁴ *Cultural Resources Review for the San Diego Gas & Electric Company Cleveland National Forest Power Line Replacement Projects, Circuit 440 Phase II, Notice to Proceed #27*, San Diego County, California. Prepared by ASM Affiliates, Inc. March 19, 2020.

⁵ HPMP Appendix A Update Table, Attachment 3 of *Cultural Resources Review for the San Diego Gas & Electric Company Cleveland National Forest Power Line Replacement Projects, Circuit 440 Phase II, Notice to Proceed #27*, San Diego County, California. Prepared by ASM Affiliates, Inc. March 19, 2020.

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pole was anticipated to range from 1.1 to 2.8 feet in diameter. As the final pole heights are under the maximum height and the pole diameters are within the diameter range analyzed in the Final EIR/EIS, these poles are within the scope of the California Environmental Quality Act (CEQA) analysis. Therefore, assumptions made regarding permanent impacts and impacts to visual resources in the Final EIR/EIS analysis are applicable to the poles on Phase II of C440.

The Final EIR/EIS analysis includes a table listing 54 eligible historic cabins that were previously recorded on C440 (Table D.5-10) at the time of the environmental analysis. According to Table D.5-12 in the Final EIR/EIS, 16 new poles were proposed near 16 historic cabins and could have an indirect impact on these resources. The Final EIR/EIS determined that with implementation of MM CUL-1, MM CUL-2, APM CUL-01, APM CUL-04, and APM CUL-05, potential adverse and significant impacts to historical resources would be mitigated under the National Environmental Protection Act (NEPA) and would be less than significant with mitigation under CEQA (Class II). Additionally, it was determined that with implementation of MM CUL-1, there will be no adverse effect to historic properties associated with the implementation of the proposed project, in accordance with Section 106 of the National Historic Preservation Act.

The cabins were first evaluated in the *Historic Resources Survey and Evaluation Report. Recreation Residences: Descanso District*, which was prepared by James Newland for the Cleveland National Forest, U.S. Department of Agriculture Forest Service, Pacific Southwest Region in September 1995. As requested by the U.S. Forest Service (USFS), the inventory of these cabins was re-assessed utilizing the same criteria as provided for in Newland's evaluation report and current site conditions. The re-assessment⁶ determined that only 45 of the existing cabins are now considered eligible. Integrity of setting is considered a contributing element to the individual eligibility of each cabin. The final design as described in NTP request #27 shows that only two new poles are currently proposed near cabins that are considered eligible resources, resulting in 14 fewer new poles than identified in the Final EIR/EIS.

CPUC Bullet #6

Please ensure poles identified in MM VIS-1 and new poles as appropriate are integrated into the Scenery Conservation Plan and clearly differentiated between what poles were previously included and if new poles as part of final project design are required to be included.

SDG&E Response to Bullet #6:

The Scenery Conservation Plan update for Phase II of C440, submitted April 28, 2020⁷, defines which poles in the final design require treatments in accordance with MM VIS-01. The final

⁶ *Recreational Residences within the Laguna Mountain Recreation Area Historic Resources Evaluation Report, Cleveland National Forest, San Diego County, California* (Stringer-Bowsher et al. 2020) submitted to Cleveland National Forest Heritage Resources and CPUC staff on January 17, 2020 and "revised" March 10, 2020.

⁷ Minor revisions to the update were submitted on May 1, 2020 in accordance with requests from the USFS.

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design for Phase II of C440 includes elements of both the Proposed Project and the Federal Preferred Alternative; therefore, both analysis sections were utilized.

There are no new poles proposed in areas that were not previously analyzed in the visual resources analysis in the Final EIR/EIS for the Proposed Project or Federal Preferred Alternative. For the portions of Phase II of C440 being undergrounded, the visual resource analysis in the Final EIR/EIS for the Federal Preferred Alternative is applicable and no poles were identified that required treatments. For the portions of Phase II of C440 that are not being undergrounded, the visual resource analysis in the Final EIR/EIS for the Proposed Project analysis is applicable. Poles P40368, P109956, and P40370 were the only poles identified in MM VIS-1 as requiring treatments within the Laguna Mountain Recreation Area.

CPUC Bullet #7a

There was a verbal request from the USFS during the 4/13/20 page [turn] requesting that SDG&E identify if any new interest/intercept poles or taller poles that will be installed near (eligible) cabins and determine if any of said poles would visually impact the setting or the eligibility of the cabin. This was provided in the attached excel sheet.

Please confirm whether scenery was a contributing element in the recommendations for eligibility in the Historic Resources Evaluation Report (the report requested by USFS). CPUC will coordinate further with USFS regarding necessary documentation from CPUC needed for SHPO review, and the timing of that documentation.

SDG&E Response to Bullet #7a:

The cabins were first evaluated in the *Historic Resources Survey and Evaluation Report. Recreation Residences: Descanso District*, which was prepared by James Newland for the Cleveland National Forest, U.S. Department of Agriculture Forest Service, Pacific Southwest Region in September 1995. This evaluation included “Setting” as one of the seven aspects of integrity that contributes to the overall eligibility of the historic recreation resident tracts and individual cabins. As per guidance given by the State Historic Preservation Officer and the USFS, SDG&E utilized the same aspects of integrity, including “Setting,” to re-assess the cabins in regard to current conditions.

CPUC Bullet #7b

As part of SDG&E’s response in Row/Column E33 in the attached table, there is detailed information about possible new effects to lots considered in the FEIR/EIS, based on final design (new poles, or changes in height). See below.

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SDG&E Response to Bullet #7b:

The USFS requested that SDG&E provide very specific pole information about final design heights and relative location to the individual cabins. This information was not intended to provide for a regulatory analysis of the final design for Phase II of C440.

As discussed in the response to CPUC Bullet #5, the Final EIR/EIS determined that for the 16 new poles located near cabins, potential adverse and significant impacts to historical resources would be mitigated under NEPA and would be less than significant with mitigation under CEQA (Class II) with implementation of MM CUL-1, MM CUL-2, APM CUL-01, APM CUL-04, and APM CUL-05.

The final design as described in NTP request #27 shows that only two new poles are currently proposed near cabins that are considered eligible resources, resulting in 14 fewer new poles than identified in the Final EIR/EIS. Therefore, it was determined that impacts will be reduced by the final design as described in NTP request #27.