

DRAFT SCOPING REPORT

**Environmental Impact Report/
Environmental Impact Statement
San Diego Gas & Electric
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

Lead Agencies:

California Public Utilities Commission

505 Van Ness Avenue
San Francisco, California 94102
Contact: Lisa Orsaba, 415.703.1966

**United States Department of Agriculture
Forest Service - Cleveland National Forest**

18045 Rancho Bernardo Road
San Diego, California 92127-2107
*Contacts: Robert Hawkins, 916.849.8037
Debbie Hobbs, 858.674.2904*

Prepared by:

DUDEK

605 Third Street
Encinitas, California 92024

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ABBREVIATIONS AND ACRONYMS USED IN THIS REPORT

ALJ	Administrative Law Judge
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CEQA	California Environmental Quality Act
CNF	Cleveland National Forest
CPUC	California Public Utilities Commission
CSP	California State Parks
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
MSUP	Master Special Use Permit
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NOP	Notice of Preparation
kV	Kilovolt
PTC	Permit to Construct
ROW	right-of-way
SDG&E	San Diego Gas & Electric Company

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1.0 INTRODUCTION

The California Public Utilities Commission (CPUC) and the United States Forest Service (Forest Service) serve as joint lead agencies for San Diego Gas & Electric's (SDG&E's) proposed Master Special Use Permit/Permit to Construct (MSUP/PTC) Power Line Replacement Projects. On January 23, 2012, CPUC and Forest Service signed a Memorandum of Understanding that will govern the preparation of a joint Environmental Impact Report /Environmental Impact Statement (EIR/EIS). The CPUC, as the lead agency under California law, and the Forest Service, as the lead agency under federal law, will prepare a Draft and Final EIR/EIS to comply with both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

SDG&E's proposed MSUP/PTC Power Line Replacement Projects would consolidate over 70 previously issued special use permits and easements for SDG&E facilities within the Cleveland National Forest (CNF) into one MSUP to be issued by the U.S. Forest Service (Forest Service). Project approval would allow the continued operation and maintenance of SDG&E's existing 69 Kilovolt (kV) power lines, 12 kV distribution circuits (C), and ancillary facilities, as well as approximately 45 miles of existing access roads required to maintain and operate SDG&E electric facilities within the CNF.

In addition to combining the previously issued permits and easements for existing SDG&E facilities within the CNF into one MSUP, the proposed action includes the replacement of five existing 69 kV power lines and six 12 kV distribution circuits located within and outside of the CNF, referred to herein as the Proposed Powerline Replacement Projects. Power line replacement would primarily include fire hardening along with relocation, removal, undergrounding, and single-circuit to double-circuit conversion along certain facilities and segments. The proposed Power Line Replacement Projects will require authorization under the MSUP as well as approval of a Permit to Construct (PTC) from the CPUC.

The CNF MSUP study area is located in Orange and San Diego counties, California within the Trabuco, Palomar, and Descanso ranger districts of the CNF. The proposed power line replacement projects are located in the central portion of San Diego County, within and outside the Palomar and Descanso ranger districts of the CNF and in the vicinity of a number of unincorporated communities including but not limited to Alpine, Boulevard, Pine Valley, Descanso, Campo, Ramona, Pauma Valley, Santa Ysabel, Julian, and Warner Springs. The proposed power line replacement projects not only traverse National Forest System Lands, but due to the patchwork of land ownership in the project study area, also traverse lands managed by the Bureau of Land Management (BLM); tribal lands of the La Jolla, Campo, Inaja, and Viejas Indian Reservations managed by the respective tribes and held in trust by the Bureau of Indian

Affairs (BIA); Cuyamaca Rancho State Park lands managed by California State Parks (CSP), and private holdings within unincorporated San Diego County. Please refer to the CPUC project website for additional project detail at <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

This public scoping report documents the CPUC's and Forest Service's CEQA and NEPA scoping process and the comments received for the proposed project. Specifically, this report describes the scoping activities and documents the comments received on the CPUC's Notice of Preparation (NOP) and Forest Service's Notice of Intent (**NOI**). This report serves as an information source to the CPUC and Forest Service in its determination of the range of issues and alternatives to be addressed for the proposed MSUP/PTC Power Line Replacement Projects. The CPUC and Forest Service will use the comments received during the scoping period to:

- Identify key issues to focus the analysis
- Identify reasonable alternatives for analysis
- Present environmental impacts of the proposed action and alternatives
- Identify ways to avoid or reduce environmental impacts
- Inform the agency decision-making process.

1.1 Scoping Report Organization

This public scoping report is organized as follows:

- Section 1 provides a general introduction, purpose, and intent the scoping report.
- Section 2 provides a summary of the CEQA/NEPA scoping process.
- Section 3 provides a list of the federal, state, and local agencies, organizations, and individuals who commented during the scoping period.
- Section 4 provides an overall summary of the comments received and issues raised during the project's public review period.
- Section 5 provides a summary of future steps in the planning process and indicates opportunities for public participation in the environmental review process.
- Section 6 includes a list of references used in preparation of this scoping report.

Following is the list of appendices that includes public scoping notices, scoping meeting materials, scoping meeting transcripts, and public comments received during the public review period.

A. Notices

A-1 Notice of Preparation (posted September 23, 2013)

A-2 Notice of Intent (published in the Federal Register on December 29, 2009)

B. Scoping Meeting Notices

B-1 Public Notice (September 23, 2013)

B-2 Legal Notices

C. Scoping Meeting Materials

C-1 Meeting Agenda

C-2 Written Comment Form

C-3 Scoping Meeting Presentation

D. Scoping Meeting Sign-In Sheets

E. Comments Received During Scoping Period

E-1 Federal Agencies

E-2 State Agencies

E-3 Local Agencies

E-4 Organizations

E-5 Individuals

E-6 Tribal

E-7 Late Comments (after November 7, 2013)

F. United States Department of Agriculture, Forest Service, Cleveland National Forest State Office, November 1, 2013 Letter

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2.0 SUMMARY OF CEQA/NEPA SCOPING PROCESS

The CEQA/NEPA scoping process provides government agencies, public and private organizations, and the general public the opportunity to identify environmental issues and alternatives for consideration in the EIR/EIS. The scoping process and results are an initial step in the CEQA/NEPA process.

As required by CEQA Guidelines §15082 (14 CCR 15000 et seq.), the CPUC issued an NOP on September 23, 2013, that summarized the MSUP/PTC Power Line Replacement Projects, stated its intention to prepare a joint EIR/EIS, and requested comments from interested parties. To comply with NEPA (40 CFR 1501.7), the Forest Service published the NOI in the Federal Register to prepare an EIS for the proposed project (FR Vol. 78, No. 184, page 58270, September 23, 2013). The NOI serves as the official legal notice that a federal agency is commencing preparation of an EIS. The Federal Register serves as the U.S. Government's official noticing and reporting publication. Similar to the NOP, the NOI initiates the public scoping period for the EIS, provides information about the proposed project, and serves as an invitation for other federal agencies granted cooperating agency status to provide comments on the scope and content of the EIS. The NOP is included as Appendix A-1 and the NOI is included as Appendix A-2.

Notices were sent to 1,279 stakeholders, including 108 to federal, state, and local agencies (including 15 copies to the state clearinghouse and 7 to local libraries); 92 to local organizations/stakeholders (including 17 to local planning groups); 1,045 to the general distribution list of all those identified as property owners within a 300-foot radius of the Proposed Powerline Replacement Projects including the Forest Service Proposed Action TL 626 Study Corridor and individuals requesting to be notified of the project; and 34 Native American groups. In addition, a total of 26 notices were sent via e-mail to agencies and person's requesting to be notified via email. Specifically the following 17 local planning groups were sent a public notice:

- Alpine Community Planning Group
- Bonsall Community Sponsor Group
- Borrego Springs Community Sponsor Group
- Boulevard Community Planning Group
- Crest/Dehesa/Granite Hills/Harbison Canyon Community Planning Group
- Cuyamaca Community Sponsor Group
- Campo/Lake Moreno Community Group
- Descanso Community Planning Group
- Fallbrook Community Planning Group
- Jacumba Community Sponsor Group
- Jamul/Dulzura Community Planning Group
- Julian Community Planning Group

**SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
2.0 Summary of CEQA/NEPA Scoping Process**

- Pala-Pauma Community Sponsor Group
- Pine Valley Community Sponsor Group
- Potrero Community Planning Group
- Ramona Community Planning Group
- Valley Center Community Planning Group

The following 7 libraries received copies of the NOP and public notice:

- Descanso Branch Library
- Alpine Branch Library
- Campo-Morena Village Branch Library
- Julian Branch Library
- Pine Valley Branch Library
- Ramona Branch Library
- San Diego Public Library

The public notice is included as Appendix B-1.

The legal notice, included as Appendix B-2, was published in the San Diego Union Tribune (UT) as well as the North County edition of the UT on September 23, 2013, in the Julian News on September 25, 2013, and in the Alpine Sun on September 26, 2013. The NOP, NOI, and public notice were also made available to the public on the CPUC's website for the proposed project at: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

The NOI and public notice were also made available to the public on Forest Service's website at: <http://www.fs.fed.us/nepa/fs-usda-pop.php/?project=310>

During the NOP/NOI comment period, the CPUC and Forest Service held two public scoping meetings on October 22, and October 23, 2013, in the communities of Julian (at the Julian Elementary School, Cape Horn Old Highway 80, Julian, California 91934) and Alpine (at the Alpine Community Center, 39223 Highway 94, Alpine, California), respectively.

The scoping meetings provided the public and government agencies the opportunity to receive information on the CEQA/NEPA process and on the proposed projects and to provide written comments. Materials provided to the public at the scoping meetings are contained in Appendix C and include the following:

- Appendix C-1 – Meeting Agenda
- Appendix C-2 – Written Comment Form
- Appendix C-3 – Scoping Meeting Presentation

Appendix D includes scoping meeting sign-in sheets for the two meetings.

The 45-day comment period for the NOP and NOI ended on November 7, 2013. Late comments received through December 3, 2013 are also included in this scoping report. In total, 102 letters were received: 41 from federal, state, and local agencies and organizations; 60 from individuals; and 1 from the Pala Tribal Historic Preservation Office. Comments received are included in Appendix E to this scoping report. These comments are incorporated into the EIR/EIS project record and are documented and summarized in this public scoping report.

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3.0 AGENCIES, ORGANIZATIONS, AND PERSONS PROVIDING SCOPING COMMENTS

Federal, state, and local agencies; private and public organizations; and the general public provided written comments during the public scoping period. Written comments received during the public scoping meetings and in response to the NOP/NOI are included in Appendix E. In summary, Table 1 presents the agencies, organizations, and private citizens that provided comments during the CEQA/NEPA scoping process, organized in the order they were received.

**Table 1
Comments Received During Public Scoping Period**

Commenter	Date
<i>Federal Agencies</i>	
Department of the Army, Los Angeles District Corps of Engineers, Regulatory Division Carlsbad Field Office (Therese O. Bradford, Chief)	September 30, 2013
U.S. EPA Region IX (Scott Sysum, Energy Specialist)	November 6, 2013
<i>State Agencies</i>	
State Clearinghouse and Planning Unit (Scott Morgan, Director)	September 23, 2013
California Department of Transportation, District 11 (Jacob M. Armstrong)	October 15, 2013
<i>Local Agencies</i>	
Lakeside Fire Protection District (Andy Parr, Fire Chief)	October 14, 2013
San Diego Rural Fire District (Louis Russo)	October 29, 2013
Greater Alpine Fire Safe Council (Neville Connell, President)	November 4, 2013
City of San Diego (Jeff Pasek, Watershed Manager)	November 5, 2013
County of San Diego (Todd Snyder, Chief of Advanced Planning)	November 7, 2013
<i>Organizations</i>	
Blue Ribbon Farms, Inc. (Thomas E. K. Cerruti)	September 26, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 11, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 17, 2013
La Mesa Parkway Properties, LLC (Gary Clasen, President)	October 17, 2013
East County Magazine (Miriam Raftery, Editor)	October 21, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 22, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 22, 2013 (email resent with address)
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 22, 2013 (email resent with address)
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 22, 2013 (email resent with address)
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair) Ms. Buxton's response to Frank Brown from Viejas tribe, who requested more information on project.	October 22, 2013 (email resent with address)
California Native Plant Society, San Diego Chapter (Kay Stewart, Board Member and private citizen)	October 23, 2013

**SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
3.0 Agencies, Organizations, and Persons Providing Scoping Comments**

**Table 1
Comments Received During Public Scoping Period**

Commenter	Date
Donna Tisdale (property owner, Chair Boulevard Planning Group; Secretary, Protect Our Community Foundation; President, Back Country Against Dumps) Soitec Solar Projects, Programmatic EIR, list of concerns/issues (12-18-12)	Received October 23, 2013 at Alpine Scoping Meeting
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 23, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 23, 2013
Protect Our Communities Foundation (Kelly Fuller, Consultant)	October 29, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 29, 2013
Connect (Tyler Orion, Interim President)	October 29, 2013
EnergySource, LLC (Vincent J. Signorotti, Vice President)	October 29, 2013
Save our Rural Communities (S.O.R.E – Rich Volker, Chairman)	October 29, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	October 31, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	November 1, 2013
Mountain Health and Community Services, Inc. (Judith Shaplin)	November 1, 2013
Protect Our Communities Foundation (Kelly Fuller, Consultant)	November 4, 2013
Protect Our Communities Foundation (Kelly Fuller, Consultant)	November 5, 2013
Donna Tisdale, (Boulevard Planning Group, Chair; Individual)	November 5, 2013
Descanso Town Hall Association (Judy Inskeep)	November 6, 2013
Backcountry Against Dumps (Donna Tisdale, President)	November 7, 2013
Boulevard Community Planning Group (Donna Tisdale, Chair)	November 7, 2013
Protect Our Communities Foundation (Kelly Fuller, Consultant)	November 7 and 8, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	November 7, 2013
Forest Committee, San Diego Chapter of the Sierra Club (Cindy Buxton, Chair)	November 7, 2013
<i>Individuals</i>	
Shannon and William Davis	October 23, 2013
Randy Lenac	October 23, 2013
Kelly Fuller	October 24, 2013
Dwayne and Janette Cohoon	October 29, 2013
Skip Miller	October 29, 2013
S.J. Wilson	October 29, 2013
Jennifer Purczynski	November 1, 2013
Betty King	November 3, 2013
Brit Coupens	November 4, 2013
Gene Vick	November 4, 2013
Richard Edwards	November 5, 2013
Gerald Fisher	November 5, 2013
Holly Reinert	November 5, 2013
Signature unreadable (Maynard M.)	November 5, 2013
Signature unreadable (V. Perri)	November 5, 2013
Signature unreadable (David Ba...)	November 5, 2013
Shannon and William Davis	November 6, 2013

**SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
3.0 Agencies, Organizations, and Persons Providing Scoping Comments**

**Table 1
Comments Received During Public Scoping Period**

Commenter	Date
Barry Jantz	November 6, 2013
Nathan Weflen (multiple emails - 22)	November 6, 2013
Cindy Buxton	November 7, 2013
Marcella Sharp	November 7, 2013
Nathan Weflen (multiple emails - 17)	November 7, 2013
<i>Tribal</i>	
Pala Tribal Historic Preservation Office (Shasta C. Gaughen, Tribal Historic Preservation n Officer	October 22, 2013
<i>Late Comments</i>	
Nathan Weflen	December 3, 2013

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4.0 SUMMARY OF SCOPING COMMENTS

This section of the report summarizes the comments raised by the public and agencies during the scoping process. This summary is based upon written comments received during the NOP/NOI public scoping period. Table 1 provides a list of commenters including federal, state, and local agencies and organizations that provided written comments during the 45-day public review period. There were a number of environmental concerns raised during the public scoping process, which focused on the project’s potential effects in several environmental categories. Table 2 summarizes the comments received according to the following major themes:

- Project description
- Project alternatives
- Human environment issues
- Natural environment issues
- Operation and maintenance
- Cumulative projects and impacts
- EIR/EIS administrative and permitting issues (scoping)

Table 2
Summary of Public Scoping Comments

Project Description
<ul style="list-style-type: none"> • C78 – explain why not going within same straight alignment • Temporary power shutdowns during construction • Past reconductoring and why new reconductoring occurring • Whole of the action/connected actions (i.e., TL 637 pole replacement) • Clear purpose and need (in context of the electric power system reliability, fire risk reduction, power line undergrounding and power line relocation). • Include construction phasing plan, limited hours of operation and duration of construction • Future appurtenant facilities/smart-grid facilities (should have own environmental review when proposed in the future) • Pole size increase –provide regulations requiring this for fire safety purposes
<i>Wattage/Amperage/Capacity</i>
<ul style="list-style-type: none"> • Concern that larger conductor leads to increased capacity (don't increase more than 69 kV) • Concern that more capacity will lead to more energy projects • Temperature increase of power lines and fire safety, provide current stated amperage carrying capacity of TL626 and the new capacity SDG&E is upgrading too. • Provide current wattage • Single vs. double circuit – does not increase reliability – but increases capacity (growth-inducing)
<i>Temperature</i>
<ul style="list-style-type: none"> • Increased temperature in conductors/what is heat produced under light load, heavy load? States temperature can increase by 40% with new size conductor

Table 2
Summary of Public Scoping Comments

Project Alternatives
<ul style="list-style-type: none"> • Dismiss TL626 Forest Service Proposed Action (avoid Inaja Reservation) <ul style="list-style-type: none"> ○ development in this corridor would require access road and pad construction in untouched pristine areas – resulting in increased watershed and vegetation damage and costs to ratepayers. ○ development in this corridor would impact relics of Native Americans ○ fire hazards would not be reduced with overhead alternative • Underground TL626/C79 entirely in Boulder Creek Road or move to SR79 through Cuyamaca State Park • Underground all 12 kV distribution lines • Underground lines in Mount. Laguna area • Underground entire MSUP project in existing roadways -not cross country - for fire safety and environmental reasons • Some lines are used lightly and should be considered for complete removal (county not allowing subdividing – so there should be no big development projects in need of power). • Three ranches north of the sensitive Boulder Creek area (TL626) should be provided a solar alternative for reasonable perpetuity. • Dispersed generation (roof tops in town) • Completely remove TL 626 – avoid lands recommended for the wilderness designation <ul style="list-style-type: none"> ○ do not re-permit access road. If remains - survey and modernize access road • Underground TL 682 (La Jolla Reservation) • Underground along Viejas Boulevard in Descanso • Consolidate line around Barrett Lake with portions of the Sunrise infrastructure to remove line in places altogether (would include areas in McAlmond Canyon - towards Lake Morena, and up through Deer Horn Valley and Lyons Valley). • Renew and issue permits as-needed on federal lands to keep existing facilities working (no steel poles) • Use of composite poles (no steel poles) - in sensitive areas (near human and bird breeding, roosting or feeding areas) - less conductive • Replace poles with similar height/diameter poles (composite or steel) • Underground near popular trails/campgrounds • Pine Creek and Hauser Wilderness Areas (C157) – leave wooden poles in place and increase vegetation management and equipment inspections in wilderness portion; outside wilderness steel poles should be same height as existing poles • Hauser Canyon alignment should be researched for potential consolidation onto Sunrise • Fortune Ranch area (alignment change for scenic value) • Other: Undergrounding line would be less cost overtime for ratepayers due to ongoing maintenance costs for overhead line in difficult area, and liability if a wildfire is caused

Table 2
Summary of Public Scoping Comments

Human Environment
<i>Land Use/Recreation/Property Rights/Access/Agriculture</i>
<ul style="list-style-type: none"> • Do not increase existing right-of-way(ROW)/guy wire easements • Address impacts to livestock production, dairy and egg production, crop production, horse training and boarding, beekeeping. • Easements secured - wide enough for new structures (i.e., cross arms within ROW)? • Impacts on recreation users/campgrounds/trails/Cuyamaca State Park • Include County preserves and parklands • Address community plan goals • Compatibility with proposed Land Management Plan • Minimize public access roads in forest • Concern that project will physically divide an established community and may conflict with applicable San Diego County land use plan (Mt. Laguna, and East Jamul Deerhorn area near Cinnamon, Thyme, and area above Barrett Lake Substation)
<i>Historic Preservation (forest, lands of importance, cultural, etc.)</i>
<ul style="list-style-type: none"> • TL682 is within the San Luis Rey River watershed, considered a Traditional Use Area (TUA) • A Memorandum of Understanding or Agreement shall be prepared with interested tribes • Early consultation/government-to-government consultation • Conduct records search and pedestrian survey • One room school house (Anahuac School)
<i>Noise</i>
<ul style="list-style-type: none"> • Helicopter flights • Generator use • Request for technical noise study • Public noticing should be based on noise analysis to determine appropriate notification distance
<i>Scenic Integrity/Visual Impacts</i>
<ul style="list-style-type: none"> • Recreation and scenic value of area • Bigger/heavier wire more visible • Use of non-reflective wire • Use of reflectors on top of poles • Dark skies • No higher poles in area east end of Viejas Boulevard • Color poles brown • Sunrise Highway from Pine Valley to Lake Cuyamaca is a Nation Scenic Byway

Table 2
Summary of Public Scoping Comments

<i>Health/Safety Concerns</i>
<ul style="list-style-type: none"> • Electric and magnetic fields (cancer risk) • Stray voltage – health concern for humans and livestock • Lightning <ul style="list-style-type: none"> ○ Are steel poles really more fire resistant than wood poles? ○ Will steel poles attract lightning/could a fire be started? ○ Safety implications to campers/homes near steel poles • Performance of steel towers in extreme heat/lightning effects/grounding wires • Helicopter safety issues • Fire safety/reliability • Undergrounding would avoid fire risks • Increased temperature/heat in new lines could cause fire risk • Wood pole disposal (treated with chemicals) • Safety concerns for maintenance workers in steep slope areas
<i>Environmental Justice</i>
<ul style="list-style-type: none"> • Low income communities
Natural Environment
<i>Air Quality/Climate Change</i>
<ul style="list-style-type: none"> • Climate change – emissions, energy generation, fire hardening, and vegetation (timber in particular)
<i>Biology</i>
<ul style="list-style-type: none"> • Golden Eagles and nests in study area • Avian safety – collision/electrocution (steel poles) – contacts provided for extra design review (outside of SDG&E) • Due to remoteness of area not all plant and animal resources adequately surveyed • Conduct habitat assessments on private property • Green Ranch area – large oak trees (should not be disturbed) • Invasive species management (current work now infested) • Staging and fly yard areas too close to riparian corridors • Fish and turtle populations in streams • Construction activity (vehicle weight) damages tree roots • Endangered species concerns
<i>Hydrology</i>
<ul style="list-style-type: none"> • City of San Diego owns 9 drinking water reservoirs by TL 625, C157 and C449 – ID on project maps • Describe water source and amount of water needed for project construction and dust abatement • Availability of groundwater (cumulative impacts to groundwater supply and hydrographic basin) • Use of explosives dry up groundwater wells • Erosion – water quality • Jurisdictional wetlands and mapping
<i>Steep Slopes/Erosion/Grade of Access Roads</i>
<ul style="list-style-type: none"> • Photos of grade measurements provided – exceed engineering safe practices • Many access roads too steep/not properly maintained – causes severe erosion/remove TL626/C79 access roads • Implement modern erosion compliance • No access roads through stream channels

Table 2
Summary of Public Scoping Comments

<i>Wind</i>
<ul style="list-style-type: none"> • Highest wind speeds in County (hurricane force winds recorded at Sill Hill/Boulder Creek weather station) • Wind speed graphs provided/design for wind safety • At what wind speed will steel poles bend/safety risks? • De-energizing / re-energizing procedures during wind events
Cumulative Projects and Impacts
<ul style="list-style-type: none"> • Will replacement project support utility scale renewable energy projects? What other projects on horizon? • Cumulative projects (i.e., CAISO projects, Rugged Solar, Tierra Del Sol Solar, LanWest Solar, LanEast Solar, SolOrchards' (Tule Jim Road and Historic Route 80); Bell Bluff Substation) • Explain Renewable Energy Transmission Initiative relevancy to this project
Mitigation Measures/Monitoring
<ul style="list-style-type: none"> • Include a mitigation and monitoring plan • Sparking mitigation (for the double circuit) - specifically, how far off of the ground required and separation? • Avoidance measures • Clearly define the monitoring program with timing and success criteria • Bird mortality monitoring
Design/Operation and Maintenance
<ul style="list-style-type: none"> • Opposes cameras on power poles in Forest • Provide details regarding lightning arrester and use • Current SDG&E activities outside road limits – inadequate engineering on access roads • Need for invasive species control • Pre-approval “as-needed” pole replacements • MSUP to include gate guidelines (currently gates not always locked, have no locks, or are broken) <ul style="list-style-type: none"> ○ Lock gates at all times/contractors maintain gate log/specific lock type proposed ○ Do not paint gates white ○ Have gate signage • Implementation and enforcement of best management practices • Maintenance of some poles leading into Boulder Creek and Cedar Gorge should be by foot (prevent erosion), remove roads
EIR/EIS Administrative and Permitting Issues
<i>Scoping Process</i>
<ul style="list-style-type: none"> • More time requested to access project documents • POD not available at project repositories • Expand project community list and publish • Adequacy of public noticing • Explain dual agency process/how do you become a stakeholder in this process?
<i>Permitting/Agreements</i>
<ul style="list-style-type: none"> • Section 404 of Clean Water Act or Section 10 of the Rivers and Harbors Act. • Caltrans' ROW work – encroachment permit • SDG&E agency agreements must be enforceable and upheld

4.1 Issues to be Addressed in the EIR/EIS

The contents of the EIR/EIS will reflect input received from government officials, agencies, non-governmental organizations, and concerned members of the public during the EIR/EIS scoping period. Table 3 lists the issues to be evaluated in the EIR/EIS, many of which were derived from comments made during the scoping period.

Table 3
EIR/EIS Issues to be Addressed

Environmental Issue Area	Potential Issues or Impacts
Aesthetics	<ul style="list-style-type: none"> • Construction-related activities would result in the temporary degradation of existing visual character and quality in the project study area, including scenic vistas and other designated scenic resources. • Nighttime construction lighting may be used during project construction that could affect the nighttime view. • There may be potential conflicts associated with proposed wood to steel pole replacement with federal, state, and local plans; regulations; or standards applicable to the protection of visual resources.
Air Quality	<ul style="list-style-type: none"> • Project construction will produce short-term air emissions (fugitive dust and vehicle equipment exhaust) and may violate air quality standards during construction.
Biological Resources	<ul style="list-style-type: none"> • Project construction and vegetation management activities could result in temporary and permanent loss of native wildlife and/or their habitat. • Loss of habitat for sensitive species designated by state and federal resource agencies. • Conflict with federal, state, or local policies or ordinances protecting biological resources. • Project construction, including use of helicopters, could impact eagles on federal and non-federal lands. • Project construction and maintenance could result in impacts to jurisdictional wetlands. • Project construction and maintenance could result in the spread of invasive species.
Cultural and Paleontological Resources	<ul style="list-style-type: none"> • Construction and operation could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources. • Temporary use of staging areas and conductor pull sites could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources.
Greenhouse Gas Emissions	<ul style="list-style-type: none"> • Construction activities would result in greenhouse gas emissions.
Hazards, Hazardous Materials, Fire	<ul style="list-style-type: none"> • Leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance could contaminate soils, surface waters, or groundwater. • Fire hazard during construction and operation. • Wind speeds in the project area may exceed normal design standards • Steel towers may not perform well to high temperatures during wild fire, and may be more susceptible to lightning.
Hydrology, Water Quality, and Water Quantity	<ul style="list-style-type: none"> • Project construction and operation and maintenance, particularly use of steep access roads, could affect surface water flow and erosion rates causing subsequent downstream sedimentation and reduced surface water quality. • Water used for project construction and maintenance could impact local water supplies.

Table 3
EIR/EIS Issues to be Addressed

Environmental Issue Area	Potential Issues or Impacts
Land Use and Planning	<ul style="list-style-type: none"> • Construction would temporarily disturb ongoing or traditional land uses within the project study area. • Possible conflicts with pending land management plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.
Noise	<ul style="list-style-type: none"> • Project construction will produce short-term noise (from helicopters, vehicles and construction equipment) and may violate noise standards during construction. • Location of fly yards and associated helicopter use may impact communities away from the project area.
Public Services and Utilities	<ul style="list-style-type: none"> • Construction activities could result in increased generation of waste and disposal needs. • Fire and emergency services may be required to service the proposed project and project study area during construction and operation. • Construction may result in temporary loss of electrical service to remote communities.
Wilderness and Recreation	<ul style="list-style-type: none"> • Construction or operation could cause conflicts with ongoing or traditional recreation uses in the project study area. • Construction or operation could cause conflicts with the Wilderness Act of 1964.
Transportation and Traffic	<ul style="list-style-type: none"> • Traffic would be generated by construction worker commute trips and equipment deliveries. Hauling materials, such as poles, concrete, conductor, and excavation spoils, would temporarily increase existing traffic volumes in the project study area. Access roads could increase vehicle trespass into areas where vehicles are not authorized.
Socioeconomics/Environmental Justice	<ul style="list-style-type: none"> • The relocation of certain transmission facilities may result in social and economic effects as well as have disproportionately high or adverse effects on minority or low-income populations.
Growth Inducing Effects	<ul style="list-style-type: none"> • Increasing conductor size may increase system capacity, inducing growth in local generation. • Doubling circuits on certain transmission lines may increase system capacity and induce growth in local generation.

4.2 Issues Outside the Scope of the EIR/EIS

General comments were received that noted support of the power line replacement projects. Three commenters requested an extension of the public scoping period for a 2-4 week period. The Forest Service replied on November 1, 2013 indicating that after review of the request and in consultation with the CPUC that an extension of the comment period is not warranted (see Appendix F). In addition, a commenter indicated that a cost-benefit analysis of the project should be prepared.

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5.0 SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS

The EIR/EIS process requires a team of interdisciplinary resource specialists to complete each step. An important part of the environmental planning process is engaging the public and relevant agencies from the earliest stages of and throughout the planning process to address issues, comments, and concerns. The steps of the CEQA and NEPA planning processes and agency authority and decisions to be made are described as follows.

Identification of Issues

Issues associated with the project were identified through the scoping period, which initiated the planning process. The scoping process and the issues identified through the scoping process are documented in this scoping report.

Data Information and Collection

Much of the necessary resource data and information will be compiled from existing studies prepared for the project or through other local agencies. Additional data and information will be obtained from available sources to update and/or supplement existing data.

Preparing Draft EIR/EIS

Based on collected data, including public comments, a description of the project and alternatives (including the “no action” and “no project”) will be developed. Only alternatives that meet CEQA and NEPA screening criteria will be considered in detail. Impacts that could result from implementing the project and alternatives will be analyzed and measures to mitigate those impacts will be identified where appropriate.

Draft EIR/EIS and Public Comment Period

The Draft EIR/EIS, which is anticipated to be in mid-summer 2014, generally include the following:

- Executive summary
- Introduction/overview (including purpose and need for the project)
- Description of proposed project, Forest Service proposed action, and alternatives
- Environmental analysis (including impacts and mitigation measures to minimize impacts)
- Comparison of alternatives
- Other CEQA/NEPA considerations.

Upon completion of the Draft EIR/EIS, The CPUC will file a Notice of Completion with the California State Clearinghouse and the Forest Service will publish a Notice of Availability in the Federal Register and a 45-day public comment period will follow. Copies of the Draft EIR/EIS will be distributed to elected officials, regulatory agencies, and interested members of the public. The document will also be available online at the CPUC website: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

During this time, public comment on the Draft EIR/EIS will be received.

Response to Comments, Preparation of Final EIR/EIS, Notice of Determination, and Record of Decision

After the public comment period, the CPUC and Forest Service will respond to comments and prepare a Final EIR/EIS. The availability of the Final EIR/EIS will be announced in the Federal Register. Copies of the Final EIR/EIS will be distributed to elected officials, regulatory agencies, and interested members of the public. The document will also be available online at the CPUC website, as described previously.

After the Final EIR/EIS is completed, the CPUC will make a final decision for the proposed project. The Administrative Law Judge (ALJ) overseeing the PTC will write a draft decision based on the environmental documentation and testimony from parties to the proceeding. The ALJ and the CPUC will consider the final environmental document, along with other issues, during the preparation of the final decision on the PTC application. The Notice of Determination for the MSUP/PTC Power Line Replacement Projects is expected to be filed with the State Clearinghouse for CEQA purposes by winter 2015.

The Forest Service will be following the predecisional administrative review process, commonly known as the objection process, pursuant to 36 CFR 218, Subparts A and B. The objection process begins when the Forest Supervisor makes the Final EIR/EIS and a Draft Record of Decision available to those who have requested the documents or are eligible to file an objection. After the objection process is complete, the Forest Supervisor will issue the Final ROD.

Cooperating and responsible agencies, including the BIA (Bureau of Indian Affairs), BLM (Bureau of Land Management), and CSP (California Department of State Parks) will also use the EIR/EIS for their permitting processes. Following certification of the EIR/EIS by the CPUC, the CSP will use the EIR/EIS for their discretionary action under CEQA in their consideration of issuing the right-of-way easement for portions of the power lines within their jurisdiction. Since portions of the project will occur on lands under the jurisdiction of the BIA and BLM they will use the EIR/EIS for consideration of their required discretionary actions under NEPA.

6.0 REFERENCES CITED

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act.

40 CFR 1501.1–1501.8. NEPA and Agency Planning.

FR Volume 78. No. 184, page 58270. September 23, 2013.

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