BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Leatherbury & Lowell Family Trusts. Complainant, vs. San Diego Gas & Electric Company (U902E), Defendant.	C.11-02-009 (Filed February 9, 2011)

COMPLIANCE AFFIDAVIT OF SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E)

ALLEN K. TRIAL
101 Ash Street, HQ13
San Diego, California 92101
Telephone: (619) 699-5162
Facsimile: (619) 699-5027
E-mail: atrial@semprautilities.com

Attorney for Defendant:
SAN DIEGO GAS & ELECTRIC COMPANY

March 18, 2011

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Leatherbury & Lowell Family Trusts. Complainant, vs. San Diego Gas & Electric Company (U902E), Defendant.	C.11-02-009 (Filed February 9, 2011)

COMPLIANCE AFFIDAVIT OF
SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E)

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission") and the *Administrative Law Judge's Ruling and Order to Defendant to Prove Compliance with Conditions of Authorizing Resolution and Notice of Evidentiary Hearing* (the "Ruling"), dated March 30, 2011, which sets a deadline of March 18, 2011 for Defendant to supply affidavits and supporting exhibits, San Diego Gas & Electric Company ("SDG&E") hereby respectfully submits its Affidavit of compliance with Resolution E-4373. As directed by the Ruling, the attached Affidavit of Alan Dusi, Project Manager II-Electric Construction Services, briefly describes SDG&E's processes for complying with Resolution E-4373.

Respectfully submitted this 18th day of March, 2011.

_/s/ Allen K. Trial_____
ALLEN K. TRIAL
101 Ash Street, HQ12
San Diego, California 92101
Telephone: (619) 699-5162
Facsimile: (619) 699-5027
E-mail: atrial@semprautilities.com

Attorney for Defendant:
SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Leatherbury & Lowell Family Trusts. Complainant, vs. San Diego Gas & Electric Company (U902E), Defendant.	C.11-02-009 (Filed February 9, 2011)

AFFIDAVIT OF ALAN DUSI

My name is Alan Ernest Dusi. I have been asked to submit this affidavit in response to the *Administrative Law Judge's Ruling and Order to Defendant to Prove Compliance with Conditions of Authorizing Resolution and Notice of Evidentiary Hearing* (the "Ruling"), dated March 30, 2011.

I. IDENTIFICATION OF WITNESS

My business address is 8315 Century Park Court, San Diego, California, 92123-1593. I am employed by SDG&E as Project Manager II- Electric Construction Services. I am the project manager for the Orange Grove Transmission Enhancement Project and the TL 698 Pala to Monserate Wood-to-Steel Pole Replacement Project. My responsibilities in this role included overseeing the design and construction of the two projects. In this capacity, I was directly responsible for all aspects of electric facility design, environmental review and compliance, and construction of facilities as described in this Affidavit. I also prepared and provided supporting documents and information submitted to the California Public Utilities Commission ("CPUC") in Advice Letter

("AL") 2106-E concerning Resolution E-4373, including the construction project that is the subject of this complaint to the Commission.

I received my Bachelor's Degree in Mechanical Engineering from the California Polytechnic State University. I am registered as a professional engineer in the State of California.

II. PURPOSE OF AFFIDAVIT

The purpose of this Affidavit is to describe electric distribution and transmission facilities associated with the Orange Grove Transmission Enhancement Project and the TL 698 Pala to Monserate Wood-to-Steel Pole Replacement Project and specifically the facilities constructed on the Leatherbury & Lowell Family Trust (Leatherbury) Property pursuant to the questions posed by Administrative Law Judge (ALJ) Karl J. Bemesderfer's Ruling and Order, dated March 2, 2011.

In am sponsoring the following Exhibits to this Affidavit:

1) Exhibit A: Figures 1, 2, 3 and 4 – TL698 Typical Tangent Pole Diagrams

2) Exhibit B: Table 1 – TL698 Pole Information on Leatherbury Property

3) Exhibit C: Table 2 – TL698 Pole Information Entire Project

4) Exhibit D: Excerpts from CEQA Initial Study Checklist – TL698 Wood to Steel Pole Replacement, Monserate Substation to Pala Substation, Fallbrook – Pala, San Diego County, California, July 2009, including Attachment B – Preactivity Study Form

5) Exhibit E: Survey – TL698 Tangent Pole Structures on Leatherbury Property

III. DESCRIPTION OF THE SDG&E PROJECT ACTIVITIES

Both projects involve construction on SDG&E's transmission line, TL698. TL698 is an approximate 9.8 mile 69kV transmission line. Portions of TL698 have 12kV

electric under-build and communication infrastructure provider, Communication Infrastructure Providers' (CIP), under-build equipment and facilities (TV, telco, etc.).

The Orange Grove Transmission Enhancement Project is a project to provide the interconnection and network upgrades required for the Orange Grove Energy Facility, a 96MW peaking power plant licensed by the California Energy Commission (CEC), in April 2009.[1] The network upgrades include reconductor of TL698, the change out of approximately 33 poles, and the addition of approximately 9 new poles (interset). The replacement poles for this project included 7 foundation poles. The California Environmental Quality Act (CEQA) review[2] conducted by the CEC for the Orange Grove Energy Facility included the upgrades to TL 698.[3] Resolution E-4373 acknowledged that the Orange Grove Reconductor Project had already been reviewed pursuant to CEQA by the California Energy Commission's staff assessment for approval of the power plant.

The TL698 Pala to Monserate Wood to Steel Pole Replacement Project replaces the remaining wood poles along the line with substantially similar direct buried steel poles (approximately 75 poles).

SDG&E began construction on both projects in early December 2010 shortly after CPUC approval of the Resolution. Construction on the Leatherbury property is expected to be completed on or about April 1, pending weather and electric system outage scheduling. Construction on the remaining TL698 transmission line is expected to be completed on or about June 1, pending weather and electric system outage scheduling.

---

[1] CEC, Orange Grove Power Plant Project, Docket No 08-AFC-4.
[2] *See* Final CEC Decision - pp., 2,10, 96-97, 99-101, 259, and Final (Amended) Staff Assessment - pp. 3.3, 4.2-10, 4.2-22, 4.3-(4,21,48), 5.5-(1,7-11). The documents are available online from the CEC's website at: http://www.energy.ca.gov/sitingcases/orangegrovepeaker/documents/index.html
[3] CEC Staff Assessment, CEC Docket no 08-AFC-04.

IV. REGULATORY CONTEXT

SDG&E filed Advice Letter 2106-E with the CPUC in August 2009 to give Notice of Proposed Construction for both the Orange Grove Transmission Enhancement Project and the Pala to Monserate Wood-to-Steel Pole Replacement Project pursuant to GO 131-D. The Advice Letter asserted that both projects were exempt from the GO 131-D, Section III.B Permit to Construct.

V. APPROVAL AND CONDITIONS OF RESOLUTION E-4373

Resolution E-4373 listed the issues raised by the timely filed protests all of which were with respect to the Pala to Monserate fire-hardening project,[4] and did not identify any protests directed to the Orange Grove Reconductoring Project. The issues included, among others, that the structures were not equivalent and reduced the aesthetic quality of the environment.[5] The Complainant's late filed protest raised the issue of the scope of the easement and notice.

The Findings and Conclusions and Order of the Resolution do not address any height limitations; however, in *dicta* the Resolution does discuss height in the context of the Commission's review of unusual circumstances related to the Wood-to-Steel Pole Replacement Project. The Resolution specifically provides that:

> "In the case of the Wood to Steel replacement project two possible areas of concern have been highlighted: aesthetic impacts and the temporary impact of construction activity.
>
> **Aesthetic impact**
>
> In assessing the aesthetic impact of a project, CEQA seeks to determine whether the project will:
>
> 1) Have a substantial adverse effect on a scenic vista;
> 2) Substantially damage scenic resources;

[4] Resolution E-4373 page 3.
[5] *Id.*

3) Substantially degrade the existing visual character or quality of the site and its surroundings; or
4) Create a new and substantial light or glare.

> In this case, both the current and replacement poles are direct burial pole type, and heights are similar (average height increase of 10 feet). For the replacement steel poles, use of weatherized steel results in a similar matt/dark finish to that of the wood poles. Consequently, no substantially different elements are being introduced into the current view shed. Therefore, it is unlikely that the reconstruction will constitute a substantial visual change, and any aesthetic changes are unlikely to constitute an unusual environmental circumstance."[6]

As cited above and when placed in proper context of the Resolution *dicta*, this pertinent language addresses a single project- not both- and specifically identifies the "Wood to Steel replacement" Project. Further, it is SDG&E's understanding that the 10 foot average height increase is referring only to the poles being changed out pursuant to the Pala to Monserate Wood to Steel Pole Project. This interpretation is supported by the fact that the ten foot average is called out in SDG&E's CEQA Initial Study Checklist (Checklist) for the Pala to Monserate Wood to Steel Pole Project, the fact that the poles for the Orange Grove Reconductoring Project included different types of poles (foundation); the resolution by its own terms did not identify any protests to the aesthetics of the Orange Grove Reconductor Project and the CEQA analysis for the Orange Grove Reconductoring Project had already been completed by the CEC.

VI. SDG&E EFFORTS TO ASSURE COMPLIANCE

Height Issues

The complaint filed by the Leatherbury & Lowell Family Trusts[7] (Leatherbury) asserts and alleges that "SDG&E is exceeding the pole height limits shown on the SDG&E illustrations and as represented to the Commission". SDG&E denies this

[6] Resolution E-4373 page 8.
[7] Leatherbury & Lowell Family Trusts Complaint filed Feb 9, 2011, Case No. C1102009.

accusation. Prior to filing the Advice Letter, SDG&E completed a CEQA Checklist[8] for the TL698 Wood to Steel Pole Replacement Project. The Commission requested and received a copy of this Checklist as part of a data request during review of the Advice Letter.

The Checklist in Section 2.0 Determination stated:

> "This checklist review found that the project would not result in any significant incremental or cumulative environmental impacts. The project appears to be categorically exempt pursuant to Section 15301 Class 1(b) Categorical Exemption (CE), Operation, Repair, Maintenance, or Minor Alteration, as provided in California Environmental Quality Act (CEQA) Guidelines. This environmental review finds no exceptions to the exemptions for a CE because the project would not expand the existing approved capacity of the utility system and because the pole replacement project can be accomplished without resulting in significant impacts to the environment. In accordance with General Order 131-D, Section III (B) (1), Subsection H, the proposal to replace wood poles with steel poles is exempt from a Permit to Construct (PTC) issued by the California Public Utilities Commission (CPUC) as the project is categorically exempt pursuant to CEQA Guidelines. Project review did not find any applicable exceptions to the exemptions from a PTC."[9]

Further, the Checklist in section 7.0 Evaluation of Environmental Impacts of the Wood to Steel pole project states:

> 1. The steel replacement poles are of a comparable size, scale, and appearance to the existing wood poles. Existing pole heights in the alignment are 60 to 85 feet. The new steel poles would range in height from 60 to 95 feet, each approximately 30 inches in diameter, and would be directly embedded approximately 9 to 12 feet deep…..
>
> 2. The height of poles would be raised; however, the proposed pole replacement would not significantly change the overall visual quality compare to baseline conditions of the TL698 alignment because **the height of the poles and line would be raised only zero to twenty feet in height, with an average height increase of 10 feet.**

[8] CEQA Initial Study Checklist – TL698 Wood to Steel Pole Replacement, July 2009 submitted to the Commission's Energy Division in response to a data request dated October 6, 2009.
[9] *See* Exhibit D, Excerpts from CEQA Initial Study Checklist – TL698 Wood to Steel Pole Replacement, July 2009.

The average height increase for the Wood to Steel Pole Project was calculated by summing the difference in height between the new proposed poles and the existing poles and dividing by the number of poles (75 for the Wood to Steel project). In addition, the response to Commission data request dated October 6, 2009[10] Question 1 included Figure 2, which compared the typical existing wood pole to the proposed steel pole for the Wood to Steel project. The height of the typical existing pole was shown as +/-75 feet and the height of the typical proposed pole as +/-90 feet. The +/- is a shorthand symbol for approximate. And, the response to Commission data request dated May 17, 2010 included Figure 4 "TL698 Typical Tangent Pole Leatherbury Property" which indicates the same typical 15 foot increase in height (+/-75 feet to +/-90 feet).

Actual survey data[11] taken of the installed poles on the Leatherbury property shows an average height increase of 14.46 feet for the wood to steel poles and an average height increase of 15.1 feet for all nine (9) poles (Orange Grove Reconductor and TL698 Wood to Steel Pole Replacement). Refer to the spreadsheet in Appendix A for details, TL698 Pole Information on Leatherbury Property (Installed Height). The actual installed pole height on the Leatherbury property for the Wood to Steel Pole Replacement Project is consistent with the CEQA checklist, Exhibit D, in that no pole height increased over 20 feet (maximum installed increase is 19.7 feet). Further, the actual installed pole height on the Leatherbury property is consistent with the CEQA review conducted by the CEC for the Orange Grove Energy Facility included the upgrades to TL 698, and as depicted in Figure 4

[10] Energy Division Data Request Dated October 6, 2009 - Q1 and Q2: Orange Grove Pala Advice Letter 2106-E

[11] *See* Exhibit E: Survey – TL698 Tangent Pole Structures on Leatherbury Property, by Nolte Associates, Inc. (Wood to Steel Pole Replacement, Leatherbury Property East of Gird Road, In the County of San Diego, State of California), Survey Results dated March 9, 2011.

provided in response to the May 17, 2010 data request, in that the average pole height increase is +/- 15 feet. Overall, the projected average pole height increase for the 75 poles which will be installed as part of the Wood to Steel Pole Replacement Project is less than the estimated 10 feet stated in SDG&E's CEQA Checklist and Resolution E-4373.

Width Issues

The Leatherbury complaint also alleges that "SDG&E is exceeding the 12-foot maximum easement width specified by Resolution E-4373 and has delivered to the construction site new steel poles that exceed the 12-foot maximum width that are being readied for immediate installation".

The width of the preexisting poles and crossarms on the Leatherbury property (prior to filing of AL 2106-E) was approximately twelve feet in width. Historically, and at all times during the advice letter review process, preexisting guy wires and anchors extended both north and south of the pole line, well beyond 12 feet. The Initial CEQA Review and the Preactivity Study Form/Report (PSR) discuss that replacement poles will utilize existing guy wires where possible or guy wires will be replaced with new guy wires at approximately the same location. The PSR[12] identifies the addition of a new anchor (guy wire) on pole 219392 (located on the Leatherbury property) and that this anchor is well beyond the 12 foot width. Both the CEQA Review and the PSR documents were submitted to the Energy Division during review of the Advice Letter.[13] To the best of my knowledge, information, and belief all discussions with the Commission and Energy Division staff regarding SDG&E's ability to construct the new

[12] *See* Exhibit 4, CEQA Initial Study Checklist, Attachment B: PSR at page 6 & 7.
[13] *See* Exhibit D.

electric pole line facilities within the preexisting twelve foot easement width area, have explicitly related to the width of the poles and crossarm supporting structures and purposely did not place any conditions on guy wires, which necessarily would extend beyond the width of the crossarm (pursuant to the safety and design criteria under GO 95 and prudent engineering practices for electric line construction), and because all necessary and proper guys, anchors and braces and other fixtures for use in connection therewith, are considered accessories both under GO 131-D and the terms and conditions of the duly recorded easements.[14] Therefore, it is and has always been my understanding that the width in question under the Findings and Conclusions and Order of Resolution E-4373 refers only to the width of the pole and crossarm/insulator assembly and does not include accessory guy wires. Otherwise, the inclusion of the preexisting guy wires would have expanded the occupied width of the existing easement significantly beyond 12 feet. Resolution E-4373 (as modified by D.11-02-025), Finding of Fact 10, specifically states that "SDG&E currently has a 69 kV line that occupies a 12 foot wide easement and cannot exceed the currently occupied easement in the disputed sections. (Emphasis added).

The typical poles installed on the Leatherbury property as shown in Figure 4 includes two types of conductor supports: 1) post insulators and 2) crossarms with

[14] Notwithstanding the Commission's licensing or approval conditions specified in Resolution E-4373, Finding of Fact 10, where, as here, the existing public utility easements are properly recorded and interpreted to be effective and valid under applicable law, the actual property rights and boundaries of land conveyed can only be modified, terminated or extinguished, whether in whole or in part, by judicial proceedings in a civil court of competent jurisdiction. Accordingly, SDG&E asserts that Resolution E-4373 has no legal or declaratory effect on the intrinsic property rights of the dominant estate or any terms and conditions of the existing easements in dispute. Furthermore, because the public utility easements in question are necessary or useful in the performance of SDG&E's duties to the public, any encumbrance or disposition of said property is legally prohibited by Public Utilities Code Section 851, without first having the Commission review the associated impacts on ratepayers and any potential interferences with the operations, practices and service of such public utility to and for their several patrons or consumers, which has not occurred, and that are matters wholly outside the scope of these proceedings.

insulators. The post insulators are used in this application to support the 69kV conductor. The post insulators have one end attached to the pole with the conductor attached to the end away from the pole. The typical arrangement has two post insulators on one side of the pole and one post insulator on the opposite side in a staggered configuration. Survey data[15] of the actual installation on the Leatherbury property confirms that the distance from the centerline of the pole to the tip of the insulator is less than 6 feet in all cases. Since the actual distance from pole centerline to tip of insulator is less than 6 feet for each side of the pole, the total width of the post insulator installation does not exceed the 12 foot right of way currently occupied by SDG&E facilities.

The 12kV distribution facilities are supported on crossarms with the insulators mounted on top of the crossarms, refer to Figure 4 in Appendix A for the typical installation. These crossarms are manufactured to be 12 feet in length. **Actual survey data documents that the crossarms as installed are 12 feet in width confirming that the crossarms are no wider than the facilities currently occupied by SDG&E facilities.**

The Leatherbury complaint also questions placement of the new poles on the same centerline as the existing poles. In response to this question, note that the replacement poles on Leatherbury property are installed within 3-5 feet of the existing pole along the same centerline, in accordance with standard construction practices and within accepted construction tolerances.

[15] *See* Exhibit E: Survey – TL698 Tangent Pole Structures on Leatherbury Property, by Nolte Associates, Inc. (Wood to Steel Pole Replacement, Leatherbury Property East of Gird Road, In the County of San Diego, State of California), Survey Results dated March 9, 2011.

To the best of my knowledge, information, and belief, all of the statements contained in the foregoing affidavit are true and accurate.

I declare under penalty of perjury that the foregoing is true and correct.

WITNESS my hand and on this 17 th day of March, 2011.

ALAN DUSI
Project Manager II- Electric Construction Services
San Diego Gas & Electric Company

State of California)
)
County of San Diego)

Subscribed and sworn to before me on this 17 th day of March, 2011, by

Alan E. Dusi, proved to me on the basis of satisfactory evidence to be the
Name of Signer

person who appeared before me.

C. P. PEACOCK
COMM. #1856581
NOTARY PUBLIC • CALIFORNIA
SAN DIEGO COUNTY
Commission Expires Jul 3, 2013

C. P. Peacock
Signature of Notary Public

Exhibit A

Figures 1, 2, 3 and 4 – TL698 Typical Tangent Pole Diagrams

POLE DIAMETERS	WOOD	STEEL
TOP DIAMETER	9.8"	10.0"
BOTOM DIAMETER	19.6"	25.0"

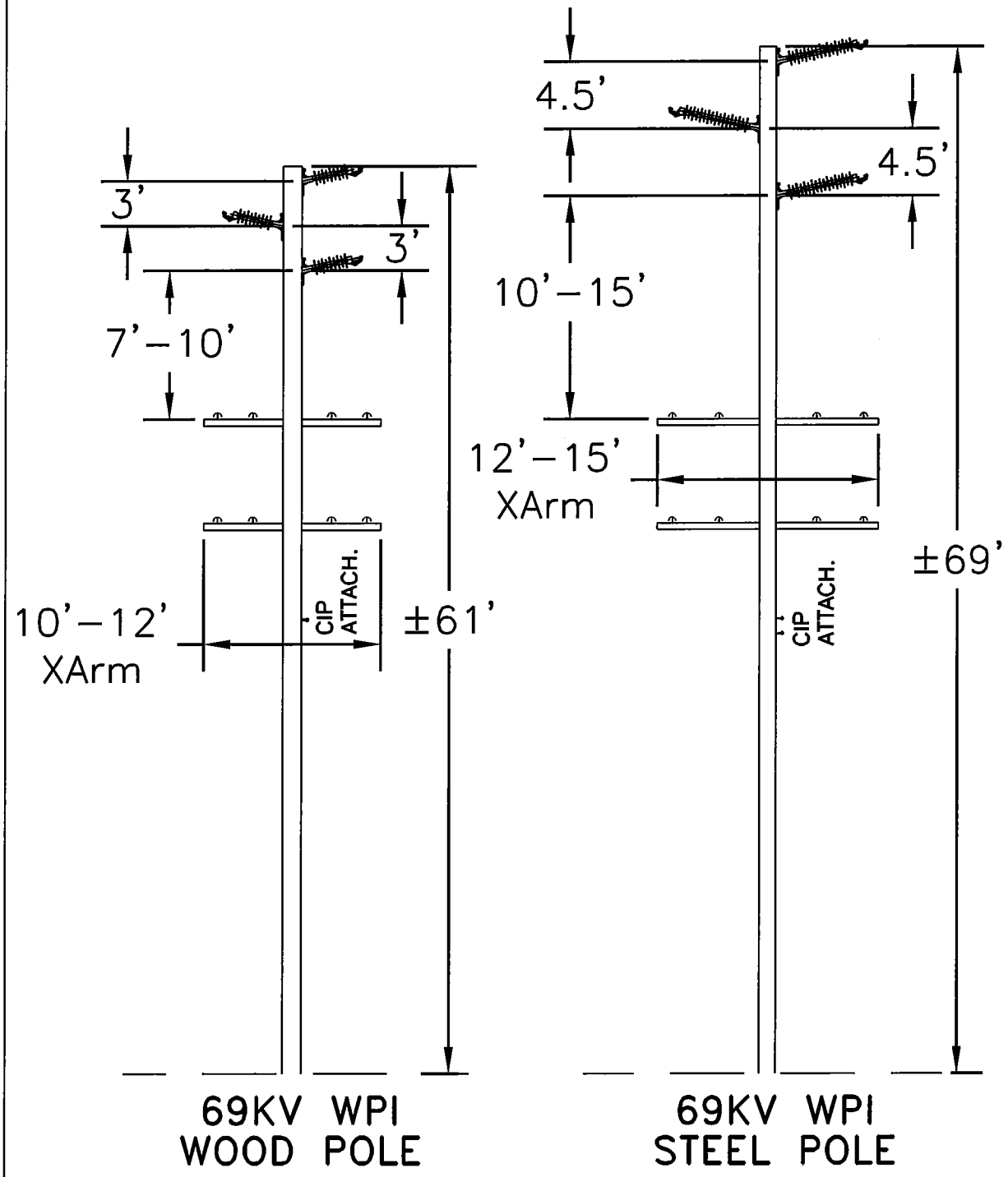


FIGURE 1

TL698 TYPICAL TANGENT POLE
WEST OF GIRD ROAD

SCALE 1:10

D: \ASC_Data\W2S-Pole.dwg 10/9/2009 1:56 PM

POLE DIAMETERS	WOOD	STEEL
TOP DIAMETER	9.8"	10.0"
BOTOM DIAMETER	19.6"	25.0"

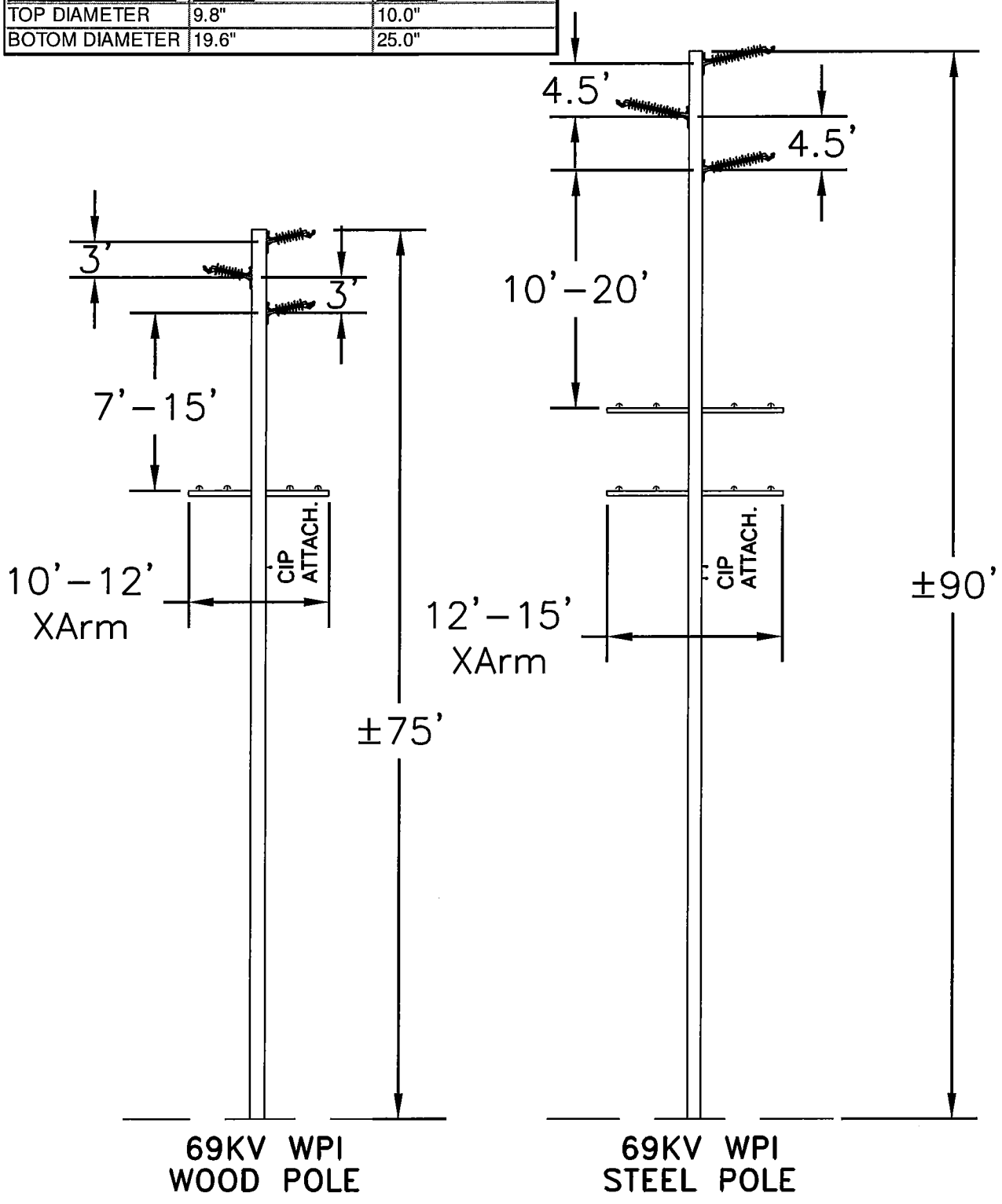


FIGURE 2

TL698 TYPICAL TANGENT POLE
EAST OF GIRD ROAD

SCALE 1:12

D: \ASC_Data\W2S-Pole.dwg 10/9/2009 1:57 PM

POLE DIAMETERS	WOOD	STEEL
TOP DIAMETER	9.8"	10.0"
BOTOM DIAMETER	19.9"	28.1"

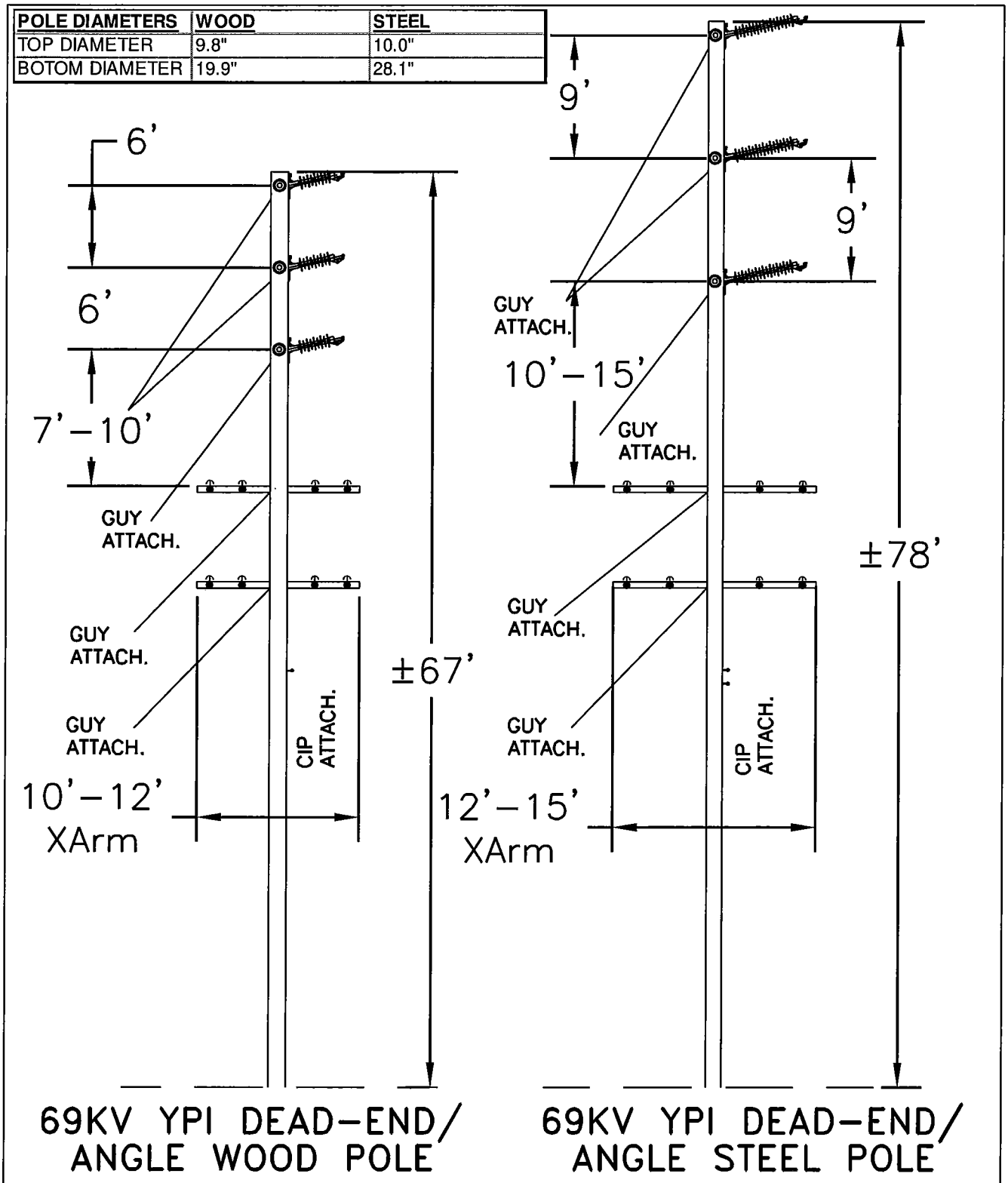


FIGURE 3

TL698 TYPICAL DEAD-END/ANGLE POLE WEST OF GIRD ROAD

SCALE 1:10

D: \ASC_Data\W2S-Pole.dwg 10/9/2009 1:54 PM

POLE DIAMETERS	WOOD	STEEL
TOP DIAMETER	9.8"	10.0"
BOTTOM DIAMETER	19.6"	25.0"

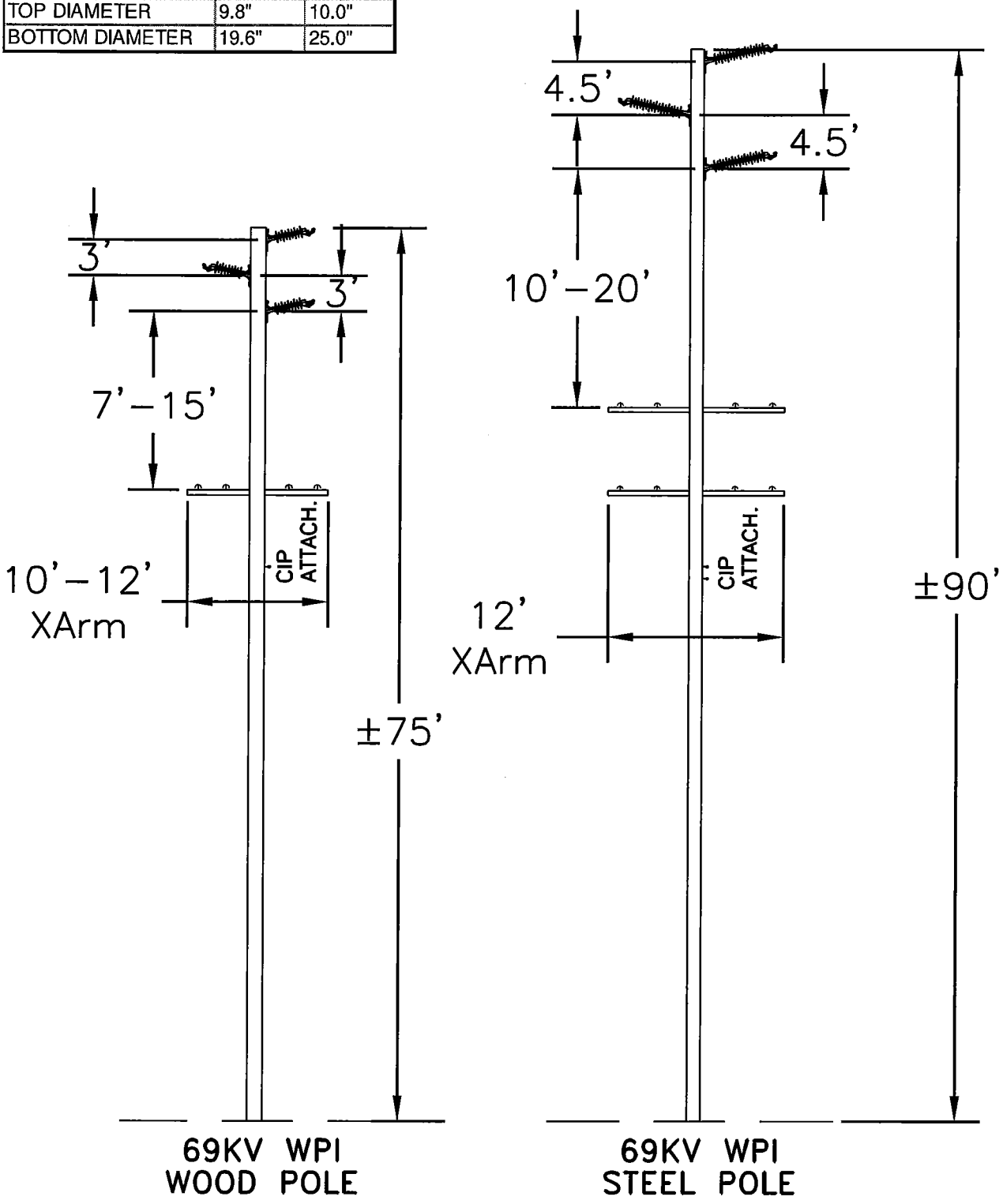


FIGURE 4

TL698 TYPICAL TANGENT POLE
LEATHERBURY PROPERTY

SCALE 1:12

D:\ASC_Data\W2S-Pole-Rev 1.dwg 5/11/2010 3:11 PM

Exhibit B

Table 1 – TL698 Pole Information on Leatherbury Property

Table 1: TL698 Pole Information on Leatherbury Property (Installed Height)

3/11/2011

POLE #	Reconductor & W-S Pole Count	Reconduct or Pole Replacement	W-S Pole Replacement	Pole Class	Total Width at Lowest Xsmn Insulator (Ft.)	Distribution Cross Arm Length (Ft.)	Remarks	Exist Pole Height	Installed New Pole Height as Measured by Survey, ft*	W2S Height Increase, ft	Reconduct or Pole Replacment Height Increase, ft
219386	1		1	H5	11.7	12	LEATHERBURY	61	80.7	19.7	
219387	1	1		H5	11.7	12	LEATHERBURY	65.5	83.5		18
219388	1	1		H5	11.7	12	LEATHERBURY	56.5	73.2		16.7
219389	1		1	H5	11.7	12	LEATHERBURY	56.5	73.9	17.4	
219390	1		1	H5	11.7	12	LEATHERBURY	56.5	73.9	17.4	
219391	1		1	H5	11.7	12	LEATHERBURY	56.5	74.7	18.2	
219392	1		1	H5	11.7	12	LEATHERBURY	52	70.6	18.6	
219393	1		1	H3	11.7	12	LEATHERBURY	61	63.3	2.3	
511487	1	2	1	H3	11.7	12	LEATHERBURY	56.5	64.1	7.6	
TOTALS	**9**	**2**	**7**			**Includes Interset Poles**				**101.2**	**34.7**

Average Increase	**14.46**	**17.35**
Average Increase - All Poles	**15.1**	

Note: * Installed Pole Height

Exhibit C

Table 2 – TL698 Pole Information Entire Project

Table 2: TL698 Pole Information

DATE: 3/17/2011

POLE # **	Reconductor & W-S Pole Count	Reconductor Pole Replacement	W-S Pole Replacement	Pole Class	Total Width at Lowest Xsmn Insulator (Ft.)	Distribution Cross Arm Length (Ft.)	Remarks	Exist Pole Height	New Pole Height	W2S Height Increase, ft	Reconductor Pole Replacment Height Increase, ft
	1		1	H3	11.7	12	Monserate Sub	70	70	0	
	1		1	H3	12	12		74.5	74.5	0	
	1		1	H5	10.5	12		70	74.5	4.5	
	1		1	H3	11.7	12		61	65.5	4.5	
	1	1		H3	11.7	12	Transfer Anchors	61	74.5		13.5
	1	1		H5	11.7	12		61	79		18
	1		1	H5	11.7	12		79	79	0	
	1		1	H3	11.7	12		65.5	61	-4.5	
	1		1	H3	11.7	12		65.5	65.5	0	
	1		1	H3	11.7	12		64.5	74.5	10	
	1		1	H3	11.7	12		74.5	74.5	0	
	1	1		H3	11.7	12		52	61		9
	1		1	H3	11.7	12		64.5	61	-3.5	
	1		1	H3	11.7	12		61	65.5	4.5	
	1		1	H3	11.7	12		56.5	61	4.5	
	1		1	H3	11.7	12		56.5	65.5	10	
	1		1	H5	11.7	12		79	79	0	
	1		1	H3	11.8	12		65.5	65.5	0	
				H3	11.8	12			61		
	1		1	H3	11.7	12		64.5	61	-3.5	
	1		1	H3	11.7	12		61	61	0	
	1		1	H3	11.7	12		61	65.5	4.5	
	1		1	H3	11.7	12		65.5	65.5	0	

				SP-758	14.9	13.4	Foundation		80		
				RFS			Remove	65.5			
	1		1	RFS Trans		12	emove Transmissio	67	43	-24	
				SP-759	14.9	13.4	Foundation		80		
	1		1	H5	11.7	12		56.5	74.5	18	
	1		1	H5	11.7	12		61	70	9	
	1		1	H3		12	Dist - Interset	43	56.5	13.5	
	1		1	H5	11.7	12		52	79	27	
	1		1	H5	11.7	12		74.5	74.5	0	
	1		1	H5	11.8	12		52	79	27	
				H5	11.7	12			79		
	1		1	H3	11.8	12	Interset	61	65.5	4.5	
	1		1	H5	11.8	12		61	74.5	13.5	
	1		1	H3	11.7	12		52	70	18	
	1	1		H3	11.8	12	Caballo Lane	61	70		9
				H3	11.7	12	Interset - Caballo Ln		70		
	1		1	H3	11.7	12	Caballo Lane	61	65.5	4.5	
	1		1	H3	11.7	12		52	70	18	
	1		1	H3	11.8	12		61	79	17	
	1	1		H3	11.8	12		56.5	70		13.5
	1	1		H3	11.8	12		56.5	79		22.5
219386	1		1	H5	11.7	12	LEATHERBURY	61	80.7	19.7	
219387	1	1		H5	11.7	12	LEATHERBURY	65.5	83.5		18
219388	1	1		H5	11.7	12	LEATHERBURY	56.5	73.2		16.7
219389	1		1	H5	11.7	12	LEATHERBURY	56.5	73.9	17.4	
219390	1		1	H5	11.7	12	LEATHERBURY	56.5	73.9	17.4	
219391	1		1	H5	11.7	12	LEATHERBURY	56.5	74.7	18.2	
219392	1		1	H5	11.7	12	LEATHERBURY	52	70.6	18.6	
219393	1		1	H3	11.7	12	LEATHERBURY	61	63.3	2.3	
511487	1		1	H3	11.7	12	LEATHERBURY	56.5	64.1	7.6	
	1		1	H3	11.7	12		52	65.5	13.5	
	1		1	H3	11.7	12		56.5	65.5	9	
	1		1	H3	11.7	12		56.5	74.5	18	
	1		1	H3	11.7	12		61	70	9	
	1		1	H3	11.7	12		61	65.5	4.5	
	1		1	H3	11.7	12		56.5	74.5	18	
	1		1	H3	11.7	12		56.5	74.5	18	

	1	1		H3	11.7	12		56.5	70		13.5
	1		1	H3	11.7	12		52	65.5	13.5	
	1		1	H3	11.8	12		56.5	74.5	18	
	1	1		EXISTING ABF			Existing Pole Remain	55	55		
	1		1	H3	11.8	12		70	79	9	
	1		1	H3	11.8	12		70	74.5	4.5	
	1		1	H3	11.8	12		61	74	13	
	1		1	H3	11.8	12		61	70	9	
	1		1	H3	11.7	12		56.5	79	22.5	
	1		1	H3	11.7	12		56.5	74.5	18	
	1		1	H5	11.7	12		74.5	70	-4.5	
				SP-755	15.1	13.6	Foundation	89	110		
				SP-756	15.1	13.6	Foundation	61	110		
				RFS			Remove	56.5			
	1		1	H3	11.7	12		56.5	74.5	18	
	1		1	H3	11.7	12		61	84	23	
	1		1	H5	11.7	12		56.5	74.5	18	
	1		1	H3	11.8	12		61	79	18	
	1	1		H5	11.7	12		52	74.5		22.5
	1	1		H5	11.7	12		61	79		18
	1	1		H3	11.7	12		56.5	56.5		0
	1		1	H3	11.7	12		61	65.5	4.5	
	1	1		H5	11.7	12		65.5	79		13.5
	1	1		H3	11.7	12		61	70		9
	1		1	H5	11.7	12		61	79	18	
	1		1	H3	11.7	12		65.5	70	4.5	
	1		1	H5	11.8	12		56.5	74.5	18	
	1	1		H5	11.7	12		61	84		23
	1		1	H5	11.8	12		65.5	74.5	9	
	1		1	H5	11.7	12		56.5	79	22.5	
	1		1	H5	11.8	12		56.5	84	27.5	
	1		1	H5	11.7	12		61	70	9	
				SP-760	14.9	13.7	Foundation	61	86		
	1		1	H3	11.7	12		70	65.5	-4.5	
	1		1	H5	11.7	12		61	70	9	
	1		1	H5	11.7	12		56.5	70	13.5	
	1		1	H5	11.7	12		56.5	70	13.5	

	1		1	H3	11.7	12		56.5	61	4.5	
	1		1	H3	11.7	12		56.5	65.5	9	
	1	1		H3	11.7	12		74.5	79		4.5
	1	1		H5	11.7	15		43	79		36
	1	1		H5	11.7	15		47.5	79		31.5
				SP-762	14.9	13.4	Foundation	52	80		
	1	1		H6	11.8	12		52	97		45
	1	1		H5	11.8	12		56.5	74.5		18
	1		1	H3	11.7	12		56.5	61	4.5	
	1	1		H3	11.7	12		56.5	65.5		9
	1		1	H3	11.7	12		65.5	61	-4.5	
	1	1		H5	11.8	12		74.5	84		9.5
				SP765	14.5	11.6	Foundation	56.5	79		
	1	1		H5	11.8	12		61	84		23
	1	1		H3		12	12kV Only	74.5	61		-13.5
	1	1		H3	11.8	12		70	74.5		4.5
	1	1		H3	11.8	12		70	70		0
	1	1		H3	11.7	12		52	61		9
				H3	11.7	12			61		
TOTALS	**103**	**28**	**75**				**Includes Interset Poles**			**706.2**	**396.2**

Average Increase	**9.42**	**14.15**

Average Increase - All Direct Bury Poles **10.7**

Notes

* - Existing transmission pole being topped.

** - Pole Numbers Removed to Avoid "Privleged and Confidential" Status for Document.

Height of Installed Poles

Poles Removed from totals

Exhibit D

Excerpts from CEQA Initial Study Checklist – TL698 Wood to Steel Pole Replacement
Monserate Substation to Pala Substation, Fallbrook – Pala,
San Diego County, California, July 2009, including
Attachment B – Preactivity Study Form

CEQA Initial Study Checklist

TL 698 Wood to Steel Pole Replacement

Monserate Substation to Pala Substation, Fallbrook – Pala
San Diego County, California

July 2009

Prepared For
San Diego Gas & Electric
8315 Century Park Court, CP21E
San Diego, CA 92123

Prepared By

1903 Wright Place, Suite 190
Carlsbad, CA 92008

Table of Contents

List of Figures:

List of Attachments

1.0 PROJECT OVERVIEW

In an effort to maintain existing electric transmission tie lines in high fire and wind areas in San Diego Gas & Electric's (SDG&E) service territory, SDG&E proposes to remove 75 wood transmission, distribution intersect and stub poles and replace them with direct-embedded weatherized steel poles on tie line (TL) 698. In addition, SDG&E will increase the vertical and horizontal spacing between conductors to avoid the slapping of conductors. TL 698 is a 69-kilovolt (kV) single-circuit transmission line located in unincorporated San Diego County between the communities of Fallbrook and Pala. The TL consists of 119 wood poles between the Monserate Substation in Fallbrook and the Pala Substation in Pala. Under the TL 698 Wood to Steel Pole Replacement Project (project), SDG&E proposes to remove 75 of the wood transmission poles, including 3 wood stub poles, within the existing TL 698, and replace them with directly-embedded weatherized steel poles. Figure 1a provides an overview of the project location. The main drivers of this maintenance project are to improve the reliability of the SDG&E electric system, reduce the amount of maintenance required on the system, and protect against future wildfires.

SDG&E prioritizes the maintenance of poles in each tie line in high fire risk areas according to such factors as the existing vegetation/fuel, history of high wind speeds, age and condition of the infrastructure, and as part of a strategy to strengthen at least one transmission line into each backcountry substation for improved reliability. SDG&E periodically reviews and updates the prioritization of poles to be replaced due to changes in field conditions, primarily revegetation that fuels fires. It is estimated that approximately 1,000 poles will be replaced by the end of 2009 with additional poles to be identified for the following three years. In order to expedite the rehabilitation effort, poles that do not require new access, jurisdictional permitting, and substantial grading will be replaced in the immediate future with the remaining poles to be completed at a later date.

During the evaluation process, TL 698 met all of the criteria for immediate replacement based on the above-noted factors. Specifically, these factors include: 1) a designation of Highest Fire Risk Area for every pole on TL 698 as indicated on SDG&E's 2009 Highest Risk Fire Areas (confidential SDG&E map); 2) a proven record of experiencing very high winds based on the Pala Remote Automated Weather Station data; 3) the average age of the infrastructure being over 50 years; and 4) the proposed project resulting in the strengthening of TL 698 into Monserate and Pala Substations.

This California Environmental Quality Act (CEQA) Initial Study Checklist analyzes the potential impacts associated with replacing 75 of the 119 existing wood poles along TL 698 with steel poles, as well as impacts associated with four staging yards, one helicopter landing site, and the addition of a second distribution 12kV circuit that includes approximately 400 feet of trenching near the Pala Substation. The remaining 44 poles along TL 698 will also be replaced and the entire line will be reconductored under a separate project (SDG&E's Orange Grove TL698 Reconductor Project). Impacts associated with the Orange Grove TL698 Reconductor

Project, including two staging yards, stringing sites, access, and two helicopter landing sites, have been analyzed under a separate environmental impact assessment.

2.0 DETERMINATION

This checklist review found that the project would not result in any significant incremental or cumulative environmental impacts. The project appears to be categorically exempt pursuant to Section 15301 Class 1(b) Categorical Exemption (CE), Operation, Repair, Maintenance, or Minor Alteration, as provided in California Environmental Quality Act (CEQA) Guidelines. This environmental review finds no exceptions to the exemptions for a CE because the project would not expand the existing approved capacity of the utility system and because the pole replacement project can be accomplished without resulting in significant impacts to the environment. In accordance with General Order 131-D, Section III (B) (1), Subsection H, the proposal to replace wood poles with steel poles is exempt from a Permit to Construct (PTC) issued by the California Public Utilities Commission (CPUC) as the project is categorically exempt pursuant to CEQA Guidelines. Project review did not find any applicable exceptions to the exemptions from a PTC.

3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors listed below would not be potentially affected by this project.

❒ Aesthetics	❒ Agriculture Resources	❒ Air Quality
❒ Biological Resources	❒ Cultural Resources	❒ Geology/Soils
❒ Hazards & Hazardous Materials	❒ Hydrology/Water Quality	❒ Land Use/ Planning
❒ Mineral Resources	❒ Noise	❒ Population/ Housing
❒ Public Services	❒ Recreation	❒ Transportation/ Traffic
❒ Utilities/Service Systems	❒ Mandatory Findings of Significance	

4.0 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts:

- A finding of *no impact* is appropriate if the analysis concludes that the project would not affect the particular topic area in any way;
- An impact is considered *less than significant* if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation;
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments that have been made by the applicant of the proposed project; and

- An impact is considered *potentially significant* if the analysis concludes that it could have a substantial adverse effect on the environment.

5.0 PROJECT LOCATION AND DESCRIPTION

The proposed project is located within an unincorporated area of San Diego County, between the community of Fallbrook in the west and the community of Pala in the east (Thomas Bros. Pages 1047, 1048, 1028, 1029), as depicted in Figures 1a through 1k. The proposed project alignment occurs in portions of the Bonsall and Pala, California United States Geological Survey (USGS) 7.5′ topographic quadrangle maps.

The project involves the removal and replacement of 75 existing wood poles, including 3 existing wood stub poles, with equivalent steel poles along TL 698. The project also includes the addition of distribution 12kV circuit which is required to offload the existing circuit for enhanced service. Trenching is required to install the distribution circuit underground.

POLE REMOVAL AND REPLACEMENT

Existing wood transmission poles would be removed by sectioning the poles into pieces. Where possible, existing poles will be completely removed. If complete removal is not practical (e.g., if the pole cannot be pulled from the ground), then it will be cut at the base or six to twelve inches below the surface and filled over. If necessary to avoid impacts to sensitive resources or private property, poles may be cut off above ground.

Old poles, associated hardware, and any other debris generated from project activities would be removed from the project and disposed of properly. A list of poles included in this project, the proposed action, and construction notes for each pole is included in Attachment A.

The new poles would be installed using a line truck. It is anticipated that one pole may be set by helicopter. The average height increase of the steel replacement poles would be 10 feet higher than the existing wood poles to allow for increased vertical spacing between conductors in accordance with current design standards. The poles would be comparable in shape and scale to the existing wood poles and would be made of weathering steel that resembles the appearance of the existing wood poles. Replacement poles may also include pole steps and all poles will be constructed to current SDG&E standards, including design standards for avian protection. The steel poles would be approximately 30 inches in diameter. Figure 2 provides an example of a typical wood pole along TL 698 and an example of a typical steel pole used on previous wood to steel projects.

The permanent impact footprint for the steel poles encompasses an area of approximately 5 square feet. The replacement poles would be located as close as possible to the existing poles, generally within 3 to 6 feet. If the wood poles are completely removed, the existing holes may be modified to accommodate the new steel poles.

To install the steel poles, a 36-inch-diameter hole approximately 9 to12 feet deep would be excavated within a 10-foot-radius temporary work area using a drill rig mounted on the back of a truck, or by hand with the aid of a hand-jack powered by an air compressor. The temporary work area would be confined to the existing disturbed area around the base of the pole as much as possible (i.e., within a 10-foot radius). Plywood boards and plastic covering would be used to cover the excavated holes until pole installation activities begin. The excavated soil would be temporarily stockpiled adjacent to the excavated hole within the temporary work area and then later reused to backfill the hole after the pole has been replaced. Slurry mix may also be used to backfill poles where necessary due to the pole size and location. Per the SDG&E operational protocols, crews would spread and compact the excess soil as close to the pole as possible (e.g., within 10-feet of the pole). Soil would be compacted using tamping equipment or hand tools to minimize the potential for erosion. Excess soil may also be compacted onto existing unpaved access roads. The appropriate Best Management Practices (BMPs) would be used before, during, and after all project-related construction activities where necessary to prevent off-site sedimentation.

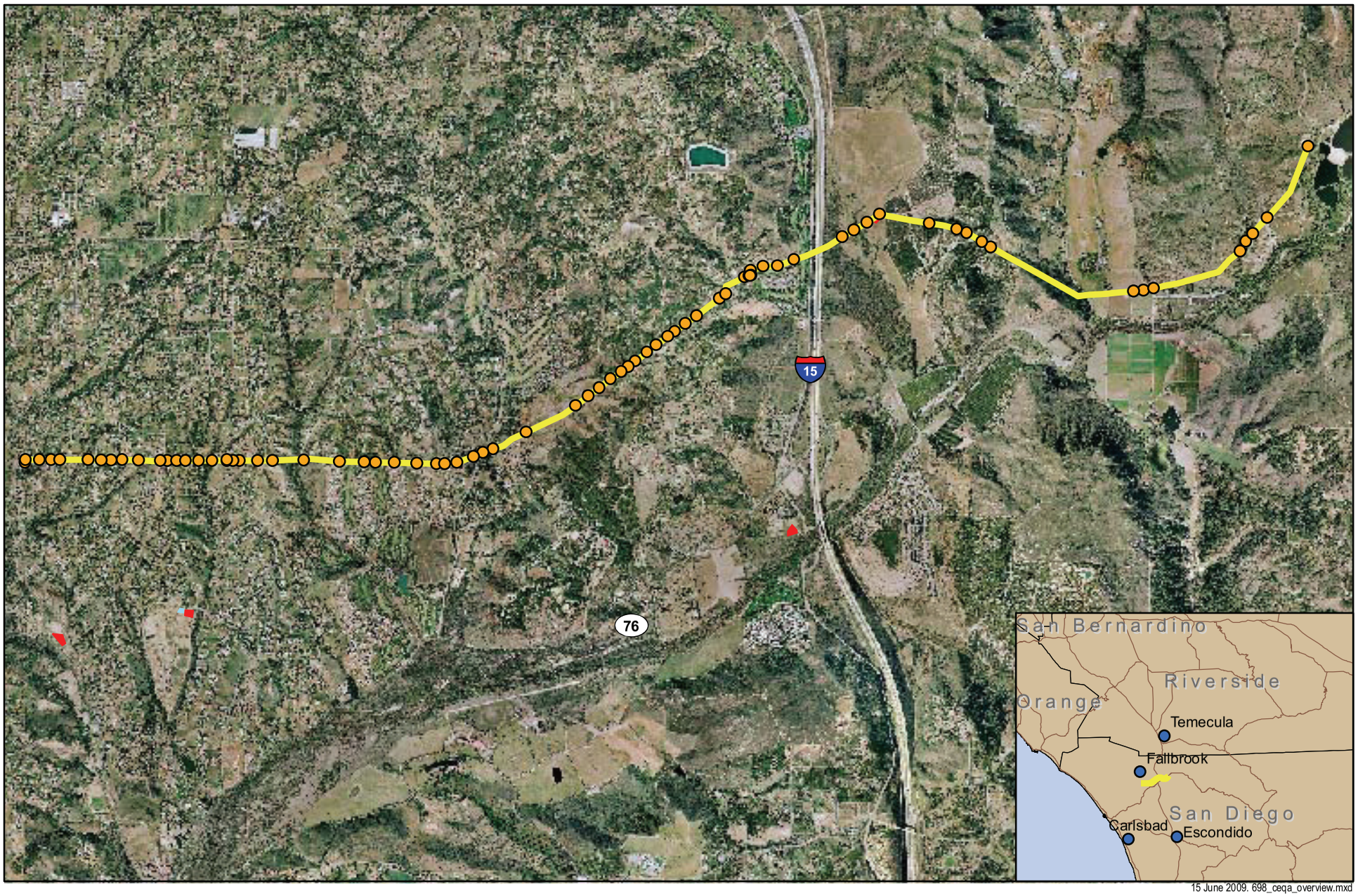
Each steel pole would also have two grounding rods. Two small trenches approximately 8-feet long, 4-feet wide and 18-inches deep would extend outward from the new pole hole for the installation of two grounding rods within the established temporary work area (10-foot radius). No permanent environmental impacts would be associated with the grounding wire installation**.**

On occasion, when rock is encountered, a hydraulic rock drilling and splitting procedure (rock drilling) may be used to minimize drilling time. The procedure involves drilling a hole in the rock and inserting a non-blasting cartridge of propellant. The cartridge is mechanically initiated by an impact generation device. This hydro-fracturing effect causes a controlled tensile crack propagation in the rock and does not result in fly rock, noxious fumes or ground vibrations (non-hazardous under OSHA 39 CFR 1910.1200; McCarthy Industries & JRM Chemical, Inc.).

It is assumed that if a pole currently contains anchors, the guy wire would be transferred to the new steel pole. Where possible, the existing guy wire for the anchor would be detached from the existing pole and reattached to the new steel pole. In some instances, to comply with design standards, anchors may be relocated and/or additional anchors may be required. Any modifications or additions to anchor locations required during construction would be evaluated by biological and archaeological monitors prior to any work. Any such modifications would be accounted for in a project biological post-construction monitoring report.

12KV CIRCUIT AND UNDERGROUND TRENCHING

A second 12kV circuit will be added to TL 698. The new 12kV circuit (Circuit 1234) will eliminate a 33-percent overload on the existing 12kV circuit (Circuit 239). The addition of this circuit will be done in conjunction with the Orange Grove TL698 Reconductor Project to minimize community disruption and disturbance. The impacts associated with the Orange Grove TL 698 Reconductor Project were addressed in a separate environmental document and no additional impacts would result from the installation of the second 12kV beyond those identified for the Orange Grove TL 698 Reconductor Project. Approximately 400 feet of 12kV circuit



Pole location
Centerline
Staging yard
Helo site

N
W
E
S

0 0.375 0.75 1.5 Miles

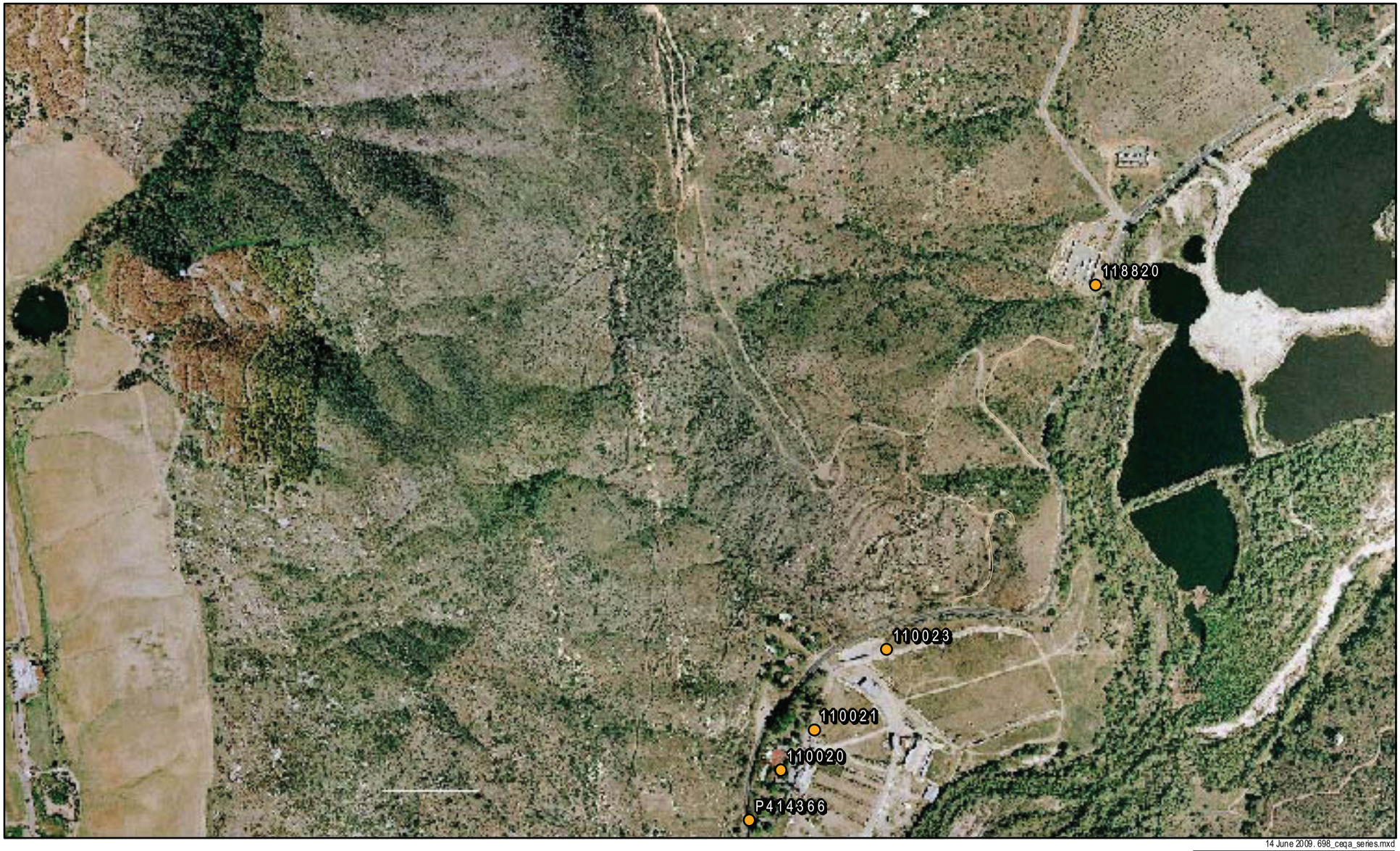
1 inch equals 0.75 miles
1:47,520

TRC

SDGE
A Sempra Energy utility

Figure 1a - Project Overview

TL 698 | Wood to Steel Pole Replacement



14 June 2009. 698_ceqa_series.mxd

Pole location
Staging yard
Helo site
Existing access roads

N
W E
S

0 200 400 800
Feet
1 inch equals 800 feet
1:9,600

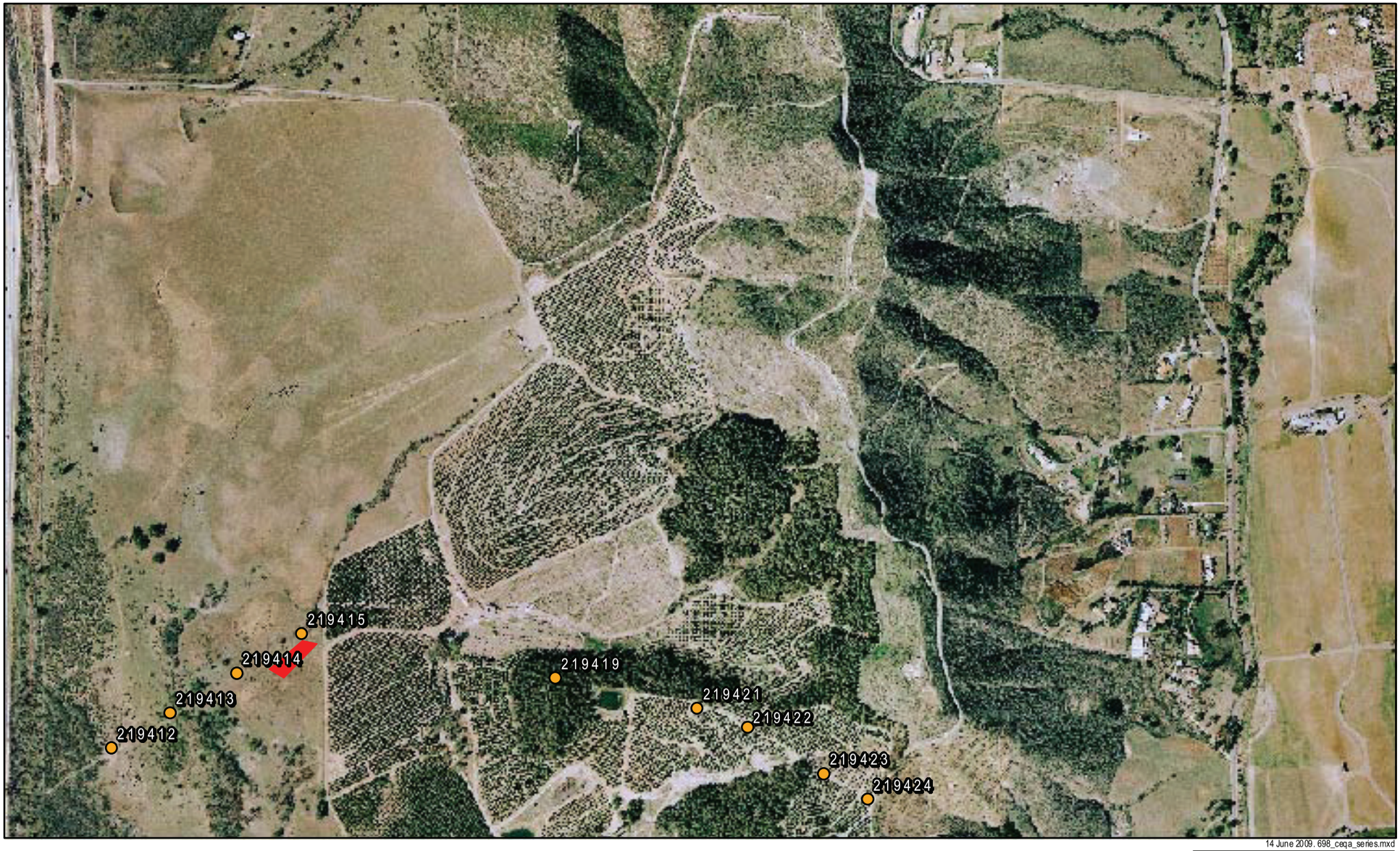
TRC

Figure 1b- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project

Figure 1c- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project



14 June 2009. 698_ceqa_series.mxd

Pole location
Staging yard
Helo site
Existing access roads

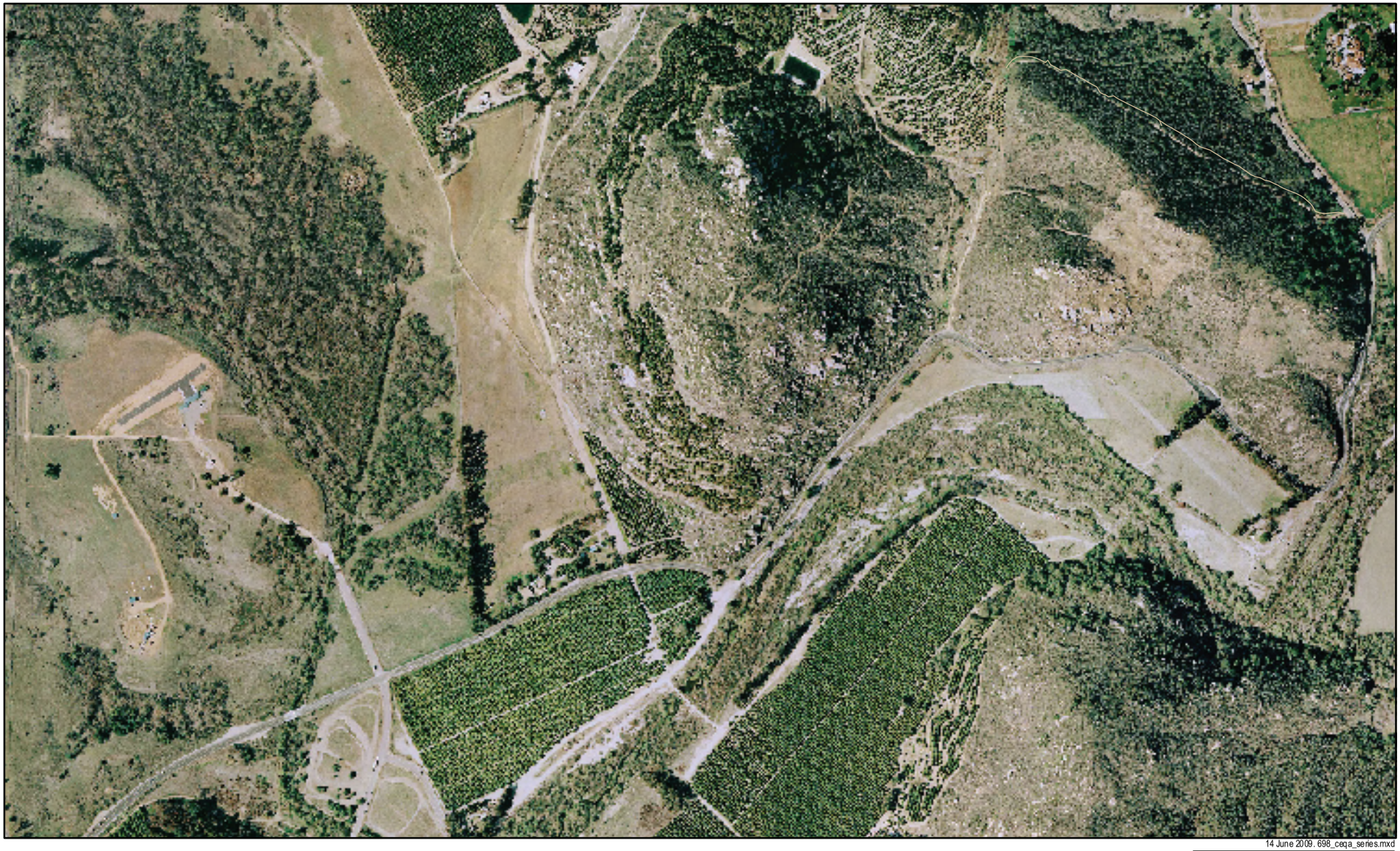
N
W E
S

0 200 400 800
Feet
1 inch equals 800 feet
1:9,600

TRC

Figure 1d- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project

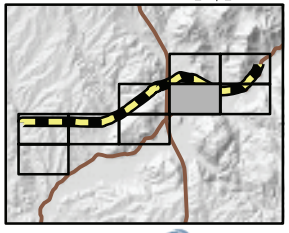


14 June 2009. 698_ceqa_series.mxd

Pole location
Staging yard
Helo site
Existing access roads

N
W E
S

0 200 400 800
Feet
1 inch equals 800 feet
1:9,600



TRC

Figure 1e- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project

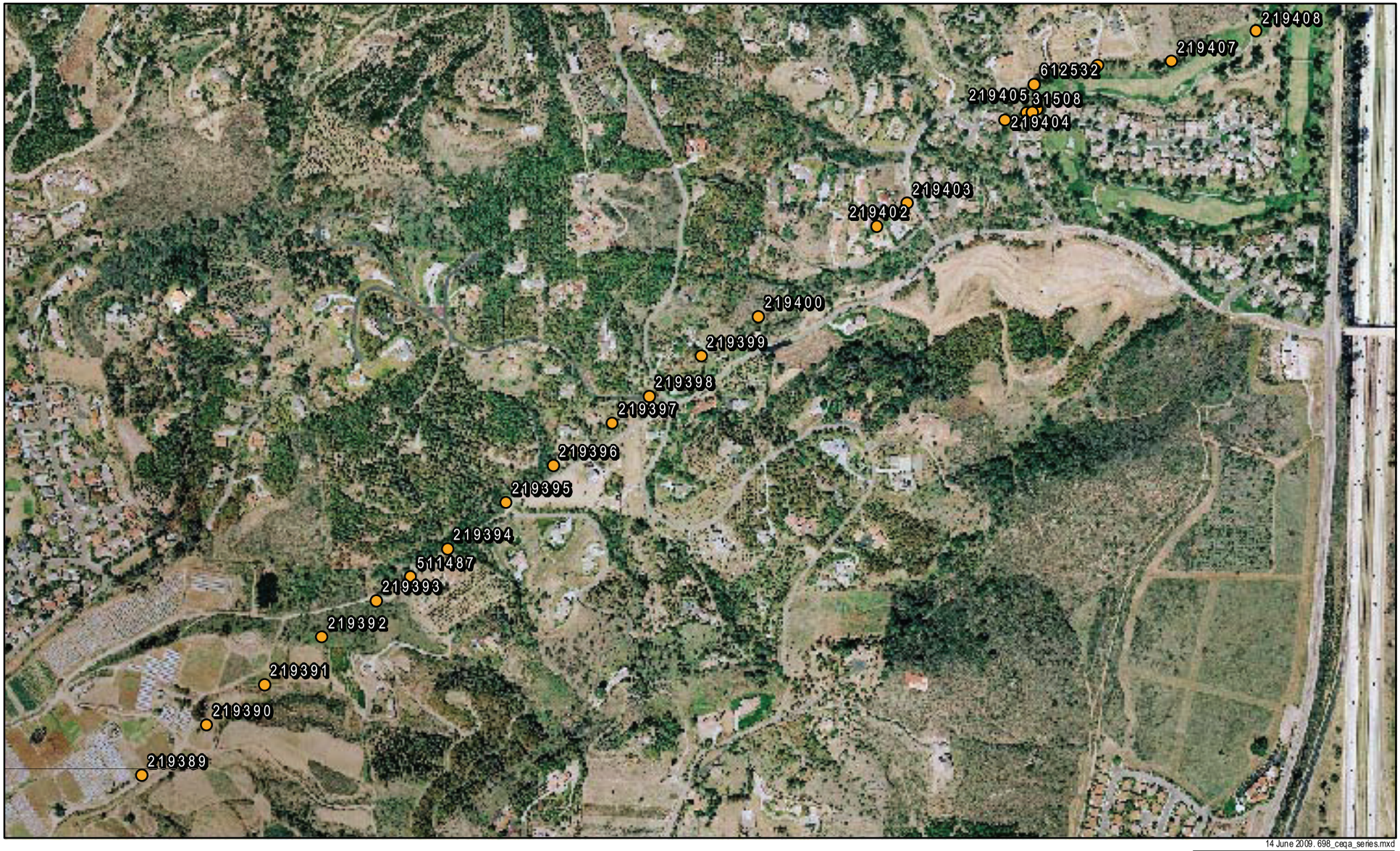


Figure 1f- Site Map Series

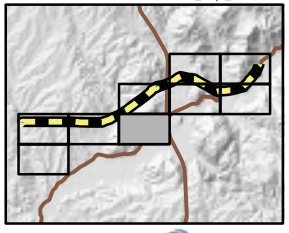
Tie Line 698 | Wood to Steel Pole Replacement Project

14 June 2009. 698_ceqa_series.mxd

Pole location
Staging yard
Helo site
Existing access roads

N
W E
S

0 200 400 800
Feet
1 inch equals 800 feet
1:9,600



TRC

Figure 1g- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project

14 June 2009. 698_ceqa_series.mxd

Pole location
Staging yard
Helo site
Existing access roads

N
W
E
S

0 200 400 800
Feet
1 inch equals 800 feet
1:9,600

TRC

Figure 1h- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project

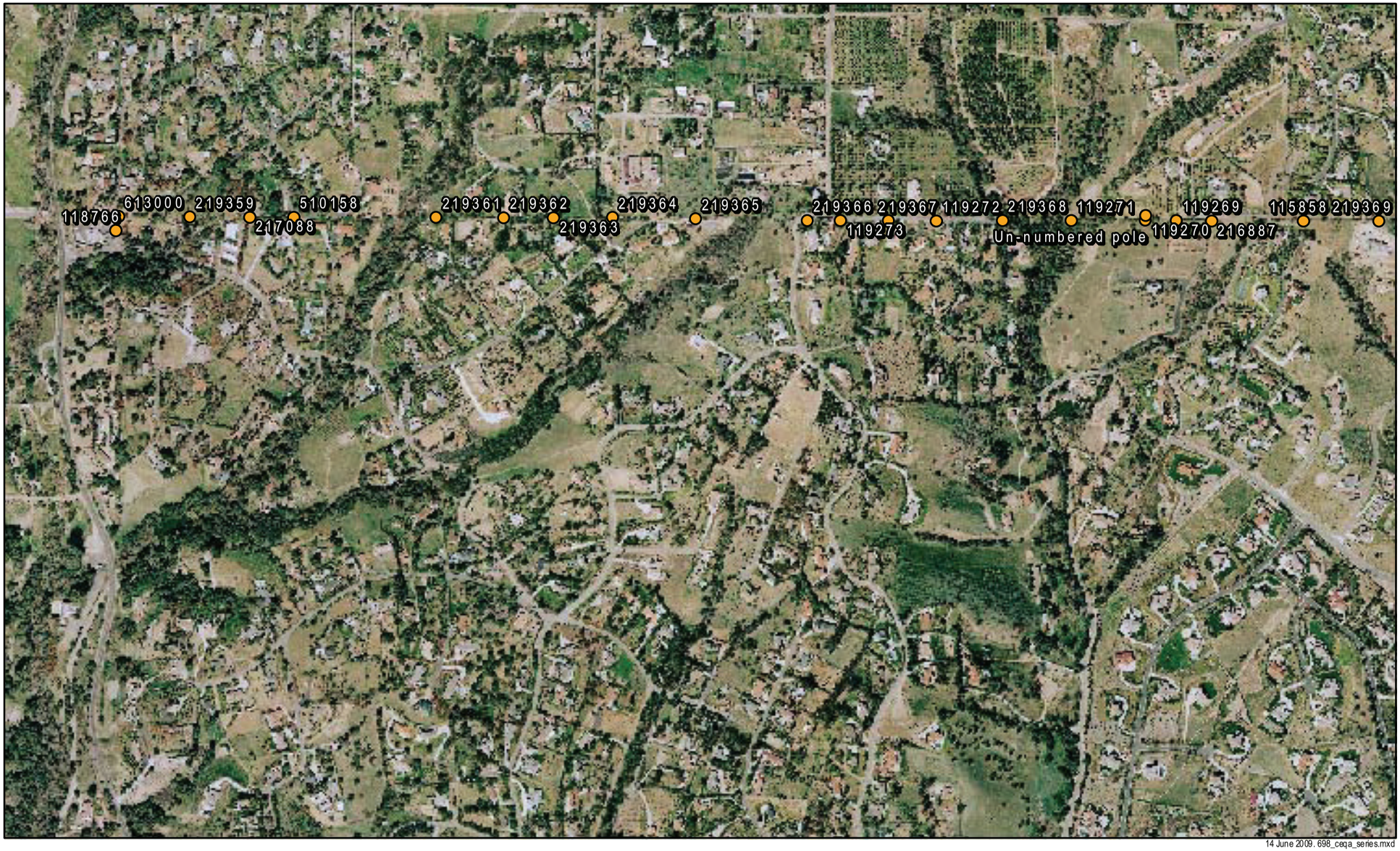


Figure 1i- Site Map Series

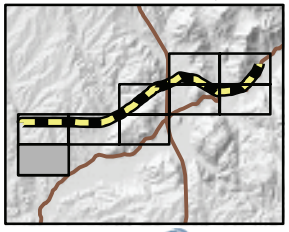
Tie Line 698 | Wood to Steel Pole Replacement Project

14 June 2009. 698_ceqa_series.mxd

Pole location
Staging yard
Helo site
Existing access roads

N
W E
S

0 200 400 800
Feet
1 inch equals 800 feet
1:9,600



TRC

Figure 1j- Site Map Series

Tie Line 698 | Wood to Steel Pole Replacement Project

Figure 2: Photographs of Wood and Steel Poles

Existing wood pole and alignment along TL 698.

Steel poles and alignment along a previous Wood to Steel project (TL 681).

underground trench, conduit, and cable for TL 698 will be installed in SDG&E-owned property at the Pala Substation. All temporary construction impacts will occur within an existing gravel road except for a small portion immediately adjacent to pole 613001 and a slope adjacent to the outside wall of the substation. All equipment required for these trenching activities will remain within the gravel access road or paved driveway. The trench will be approximately 3 feet wide and 4 feet deep. The trenching will include approximately 178 cubic yards of grading. The trench will extend from pole 613001, north along an existing gravel road, up a slope to the west, and end at an existing vault at the north entrance of the substation.

ACCESS

Existing access routes and turn around areas would be utilized for project activities. Impacts related to improvements of existing access roads and establishment of new access roads are covered under the SDG&E Orange Grove TL698 Reconductor Project. Refer to the SDG&E Natural Community Conservation Plan (NCCP) Pre-Activity Study Report (PSR) for the Orange Grove TL698 Reconductor Project for further discussion of access (TRC, July 2009).

STAGING YARDS AND HELICOPTER LANDING SITE

The project will require four staging yards which will range in size from approximately 0.5 acre to 1.6 acres resulting in a total of 5.1 acres of temporary impacts. The staging yards will serve as areas to stage material and equipment, and serve as the location for refueling vehicles and construction equipment by a mobile fueling truck throughout the duration of the project. Locations of the staging yards are depicted in Figures 1b through 1k. In addition, the project consists of a 0.6 acre helicopter landing site adjacent to the Via Monserate staging yard. Additional staging yards and helicopter landing sites that are a part of the Orange Grove TL 698 Reconductor Project may also be used by the TL 698 Wood to Steel Project. Those Staging Yards are analyzed under the Orange Grove TL698 Reconductor Project.

Brief discussions of the project staging yards and helicopter landing site are provided below.

Staging Yards

Mission Road. This 1.6-acre staging yard is located on private property within disturbed habitat. No grading is proposed; however, the site will require mowing**.** An in-ground fence is present around the perimeter of the site.

Via Monserate. This 1.5-acre staging yard is located on private property within disturbed habitat. No grading is proposed; however, the site will require mowing. Temporary in-ground fencing will be installed around the site perimeter.

Old Highway 395. This 1.5 acre staging yard is located on private property within disturbed habitat. No grading is proposed; however, the site will require mowing. Temporary in-ground fencing will be installed around the site perimeter.

Avocado Grove. This 0.5 acre staging yard is located on private land within disturbed habitat. The site is adjacent to an avocado grove. No grading is proposed; however, the site will require mowing. Temporary in-ground fencing will be installed around the site perimeter.

Helicopter Landing Site

Via Monserate. This 0.6 acre site is located on private land within disturbed habitat. No grading is proposed; however, the site will require mowing. This site will accommodate helicopter refueling and staging for helicopter-set poles.

PERSONNEL, EQUIPMENT AND CONSTRUCTION DURATION

Construction of the project will require multiple four-to-six person crews. Equipment will include a backhoe, loader, standard line trucks, a truck-mounted auger, bucket trucks, a helicopter, mobile fueling trucks, and rock drilling equipment. Project activities will take approximately four to six months to complete.

TRANSFER OF NON-SDG&E UTILITY ATTACHMENTS

All of the transmission poles, with the exception of the stub poles, have non-SDG&E utility attachments (e.g., cable TV and/or telephone). During construction, SDG&E will coordinate with representatives of the non-SDG&E utilities to coordinate the transfer of their attachments to the new steel poles within approximately 45 days from the transfer of SDG&E conductors to the new pole. SDG&E will ensure that any joint utility construction activities associated with the transfer of attachments will be completed within the construction timeframes and will comply with SDG&E's BMPs and the minimization measures described in this document.

NATURAL COMMUNITIES CONSERVATION PLAN COMPLIANCE

SDG&E operates under its own NCCP, which includes an Endangered Species Act (ESA) Section 10(A) permit and a California Endangered Species Act (CESA) Section 2081 permit (for incidental take) with an Implementation Agreement with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), respectively, for the management and conservation of multiple species and their associated habitats, as established according to the Federal and State Endangered Species Acts and California's Natural Community Conservation Planning Act.

Up to a total of approximately 270,706.3 square feet of temporary impacts and 375.0 square feet of permanent impacts are anticipated to occur as a result of activities involving pole replacement and associated laydown yards. Of these, a total of 270,242.8 square feet of temporary impacts and 367.5 square feet of permanent impacts will be to ruderal habitats (which include disturbed habitat, bare ground, landscaped/ornamental, non-native grasslands, and agricultural lands) and a total of 463.5 square feet of temporary impacts and 7.5 square feet of permanent impacts will be to native habitats, including coastal sage scrub, chaparral, and coast live oak woodland.

Additional temporary impacts will be incurred at the Pala substation from trenching activities for underground services. The trench will be 400 feet long by 3 feet wide by 2 feet deep, for a total disturbance to the ground surface of 1,200 square feet. Of the 400 feet in length of surface disturbance, only 30 feet will be to coastal sage scrub; therefore 1,100 square feet will be to bare ground and 90 square feet will be through the segment of coastal sage scrub.

As described in the project PSR (see Attachment B), mitigation for maintenance of existing facilities located outside of the Preserve is not required. Habitat located within the Preserve for which permanent impacts are anticipated and mitigation is required, includes a total of 7.5 square feet of permanent impacts to native vegetation habitats at a ratio of 2:1 (equal to 15 square feet), and 463.5 square feet of temporary impacts at a ratio of 1:1 to native habitats as a result of project-related activities that include pole replacement and staging yard. Additional temporary impacts to coastal sage scrub will occur from trenching at the Pala Substation in the amount of 90 square feet, for a grand total of 553.5 square feet of temporary impacts to native habitats as a result of all project-related activities. The mitigation ratio for impacts to all ruderal habitats is 0:1. Therefore the total credit from the mitigation bank is equal to 15 square feet of credit to account for permanent impacts plus 553.5 square feet of credit to account for temporary impacts, for a grand total of 568.3 square feet for all impacts to native habitat resulting from this project. SDG&E proposes to drawdown 568.3 square feet of credit from the mitigation bank to mitigate for all impacts, both permanent and temporary, to native habitats as a result of project-related activities.

MONITORING

As part of the proposed project, SDG&E will provide monitoring to ensure the avoidance of potentially significant impacts to resources. Specifically, monitoring for biological and cultural resources and water quality BMPs are included as features of the proposed project. Monitoring would occur at both the pole replacement locations and the staging yards as described in the project PSR and the biology, cultural, and hydrology sections of this CEQA Checklist.

6.0 ENVIRONMENTAL SETTING

The proposed project pole location sites are located in areas within the existing transmission right-of-way (ROW) within primarily residential, rural residential and undeveloped areas. The project sites are located on flat land and gentle to steep slopes in developed (suburban residential and rural residential), planted groves, and natural areas and consist of coastal sage scrub, chaparral, coast live oak woodland, non-native grassland, disturbed habitat, ornamental, agricultural, and bare ground. Several unnamed drainages or features, potentially subject to Army Corps of Engineers (ACOE), CDFG, and Regional Water Quality Control Board (RWQCB) jurisdiction, are located throughout the project area. However, because these features are located far enough away from where ground disturbance is proposed and because all appropriate BMPs will be implemented to prevent off-site sedimentation, no potentially jurisdictional areas (waters or wetlands) are anticipated to be affected as a result of project-related activities.

7.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following sections provide an evaluation of the potential environmental impacts related to the environmental factors outlined in Appendix G of the CEQA checklist.

I. AESTHETICS

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
2.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
3.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
4.	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Explanations:

1. **Less Than Significant Impact**. Transmission facilities (including TL 698) occur within several SDG&E corridors in the region and currently support the existing substations. The project would not have a substantial impact on scenic vistas because the project is located in an existing transmission corridor and entails replacing existing wood poles with similar-looking light-duty, direct-embedded weathering steel poles. The steel replacement poles are of a comparable size, scale, and appearance to the existing wood poles. Existing pole heights in the alignment are 60 to 85 feet. The new steel poles would range in height from 60 to 95 feet, each approximately 30 inches in diameter, and would be directly embedded approximately 9 to 12 feet deep with no additional concrete foundations required. The replacement poles would be made of dull (nonreflective) weathering steel.

The proposed project would not involve placement of a new visual element into the existing viewshed, as various power poles and transmission lines are currently in place. The transfer of non-SDG&E utility attachments for cable TV and telephone service will be performed within 45 days of the installation of the new pole. The transfer of attachments may result in temporary visual impacts due to the presence of two poles during construction. However, the visual impacts will be short-term in nature and upon project completion all wood poles would be removed and replaced with a single steel pole. Therefore, the transfer of all attachments would not result in long-term permanent visual impacts. A majority of the project sites are visible to the public from local roads, and construction equipment would be visible at the pole sites. These impacts would be temporary in nature however, and would not create a substantial permanent impact on any scenic vista.

2. **Less Than Significant Impact**. The project would not substantially damage scenic resources such as trees, rock outcroppings, or historic buildings, and it does not fall within any state or locally designated scenic highways. Although not officially designated as a State Scenic Highway, State Road 76 is listed as an Eligible State Scenic Highway by Caltrans. Six of the existing project poles are located along State Road 76, in the vicinity of the Pala Substation. These poles are located immediately next to the road along bare or disturbed ground. Because construction will be temporary and replacement poles will be of comparable shape, size, and color, impacts to scenic vistas along this portion of the road will be less than significant.

   Existing native vegetation will need to be cleared around some of the poles; however, this clearing would be limited to a 10-foot radius around each pole. Tree trimming will also be required at some of the pole locations as necessary. With the exception of one to two citrus trees on private property, tree and vegetation trimming will not result in permanent removal of vegetation or create a significant impact to any scenic resources.

3. **Less Than Significant Impact**. The project will not entail any changes to the existing visual character or quality of the project site or its surroundings. The proposed project would not involve placement of a new visual element into the existing viewshed, as various power poles and transmission lines currently are in place. The height of the poles would be raised; however, the proposed pole replacement would not significantly change the overall visual quality compared to baseline conditions of the TL 689 alignment because the height of the poles and line would be raised only zero to twenty feet in height, with an average height increase of 10 feet. This height difference would not cause views to differ substantially from the existing conditions. Therefore, impacts to scenic resources are less than significant.

   The use of the staging yards and a helicopter landing site during construction is not anticipated to substantially change the character of the area or result in potential impacts to scenic resources. Each of the staging yards are located in previously disturbed bare ground or maintained (disked and mowed) disturbed habitat. No scenic resources are located in these areas, and the areas would be returned to pre-existing conditions once

construction is completed. Construction activities would be temporary and would therefore not result in long-term, permanent visual impacts. Therefore, the use of the staging yards and helicopter landing site during construction is not anticipated to substantially change the visual character of the area or result in potential impacts to scenic resources. Therefore, potential impacts to scenic resources would be less than significant.

4. **Less Than Significant Impact**. Implementation of SDG&E protocols would require the use of nonspecular 636 ACSR/AW conductors for the 12kV circuit and nonreflective coatings on new steel poles to reduce the potential for impacts caused by glare and reflectivity. Nighttime lighting is not anticipated to be required. However, the possibility exists that work would occasionally extend into the evening hours, necessitating temporary lighting. In this case, lighting would be provided to allow work to continue until a safe stopping point has been reached. Lighting would consist of floodlights powered by a portable generator. The floodlights would be directed onto the work area and away from adjacent land uses, particularly residential areas and native habitat. Additionally, helicopter activity would occur during daytime hours only and would not result in lighting impacts. Therefore, impacts related to light and glare would be less than significant.

II. AGRICULTURAL RESOURCES

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	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?	☐	☐	☒	☐
2.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
3.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Explanations:

1. **Less Than Significant Impact.** As Figure 3 illustrates, portions of the project fall within land designated as Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and land designated for grazing. Table II.I below outlines the number of poles in each type of farmland designation and the total square feet of impacts associated.

Table II.I – Agricultural Land Use along TL 698

Land Designation	Number of Poles	Impacts (Square Feet)
Prime Farmland	2	10
Statewide importance	0	0
Local importance	14	70
Unique	14	70
Grazing	1	5

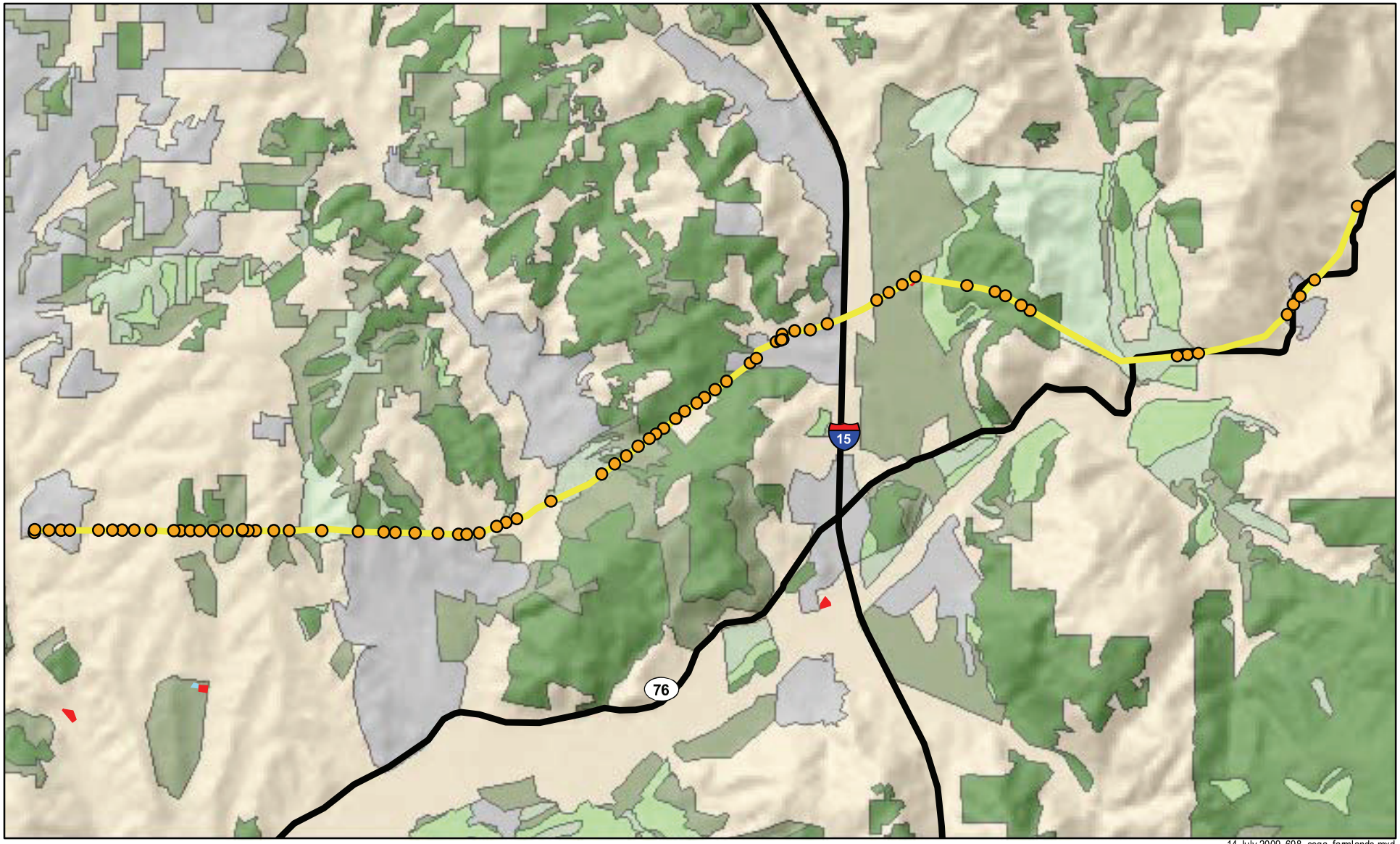


Figure 3 - Mapped Farmland

TL 698 | Wood to Steel Pole Replacement

Source: California Department of Conservation
Division of Land Resources Protection
Farmland Mapping and Monitoring Program (2006)

TRC

SDGE
A Sempra Energy utility

Agricultural uses within the project area include citrus orchards, avocado orchards, flower farms, and small produce crops. Impacts associated with the replacement of these poles will not convert these lands to non-agricultural use.

The proposed project would not alter any existing agricultural uses, and would not result in land use designation changes of agricultural use to nonagricultural uses, or lead to the removal of farmland within the alignment. Agriculture is a compatible use within and adjacent to transmission corridors. Therefore, the proposed project would result in less than significant impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

2. **No Impact.** See response to Item 1 above. The proposed project would not change the existing land use within the project alignment or in adjacent areas. No impacts to existing agricultural zoning or Williamson Act contracts would occur.

3. **No Impact.** See response to Item 1 above. The proposed project would not change the existing land use within the project alignment or in adjacent areas. No impacts related to conversion of farmland to nonagricultural use would occur.

III. AIR QUALITY

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
2.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
3.	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)?	☐	☐	☒	☐
4.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
5.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Explanations:

1. **No Impact.** The proposed project is located within the San Diego Air Basin, which is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). According to the County Guidelines for Determining Significance for Air Quality (2007), the climate of the San Diego Air Basin is dominated by the strength and position of the semi-permanent high-pressure system over the Pacific Ocean, known as the Pacific High. Sinking, or subsiding, air from the Pacific High creates a temperature inversion, known as a subsidence inversion, which acts as a lid to vertical dispersion of pollutants. This inversion layer acts as a trap for sunshine and emissions that then react together to form ozone. The San Diego Air Basin is designated by State and federal air quality standards as nonattainment for ozone and particulate matter less than 10 microns (PM_{10}) and less than 2.5 microns ($PM_{2.5}$) in equivalent diameter. The SDAPCD has developed a Regional Air Quality Strategy (RAQS) to attain the State air quality standards for ozone. At present, no attainment plan for $PM_{2.5}$ or PM_{10} is required by the State regulations (County

of San Diego 2007). According to the County Guidelines for Determining Significance (2007), projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS. Long-term operation of the proposed project would not result in additional air pollutant emissions as compared to existing conditions. Any air quality impacts would be short-term and localized as a result of off-road construction activities, vehicle usage, refueling of equipment and vehicles at staging yards, and portable equipment. The proposed replacement of existing poles would not expand capacity or extend service compared to existing conditions, and therefore would not contribute to growth of housing, population, or future emissions or other growth estimates that were used to develop the RAQS. Therefore, the proposed project is consistent with the RAQS. Additionally, since the project would not traverse federal lands and no federal action is required for the project, it would not be subject to federal agency permitting action (under the Clean Air Act's general conformity requirements). Therefore, the proposed project would not conflict with or obstruct implementation of applicable air quality plans and no impacts relative to air quality attainment plans would occur with the proposed project.

2. **Less Than Significant Impact.** As stated above, the San Diego Air Basin is designated by State and federal air quality standards as nonattainment for ozone, PM_{10}, and $PM_{2.5}$. Long-term operation of the proposed project would not result in additional air emissions compared to existing conditions; therefore, long-term operational emissions would not violate any relevant federal, State, or regional air quality standards for the San Diego Air Basin. However, as discussed below, construction of the proposed project would result in short-term, temporary air emissions of criteria pollutants.

   The main pollutants of concern related to implementation of the proposed project are short-term emissions of fugitive dust (containing PM_{10} and $PM_{2.5}$) from construction activities such as excavation, clearing, rock drilling, and off-road vehicular traffic (especially during high wind conditions). In accordance with SDG&E standard operational procedures and protocols, along with the implementation of appropriate BMPs from SDG&E's Water Quality Construction Best Management Practices Manual (2002) and dust abatement measures (e.g., wetting down of roads, coverage of rock splitting site with flexible mats), the emissions of PM_{10} and $PM_{2.5}$ shall be minimized and would not exceed state or federal air quality standards for these pollutants. Furthermore, appropriate dust abatement measures would ensure compliance with SDAPCD Rules 50 (visible Emissions) and 51 (Nuisance).

   Secondary pollutants expected are short-term nitrogen oxides (NO_X), volatile organic compounds (VOCs) and diesel particulate matter emissions in the exhaust from off-road construction equipment (e.g., backhoes, bulldozers, skid-steer loaders, and portable engines). The VOC emissions from the transfer of fuel to equipment and vehicles from mobile fuelers are not subject to permits by the SDAPCD. It is expected that the emissions from refueling vehicles and equipment would be minimal because emissions are temporary and associated only with the construction phase of the project. Moreover, appropriate BMPs from SDG&E's Water Quality Construction Best Management

Practices Manual will be implemented for refueling activities. Portable engines would be registered under the Statewide Portable Equipment Registration Program (PERP) and would meet applicable emissions requirements. Furthermore, certain equipment and vehicles powered by diesel engines would have to meet the applicable Airborne Toxics Control Measures (ATCMs) for control of diesel PM in the exhaust (e.g., ATCMs for portable diesel engines, heavy-duty diesel trucks operated by utilities and commercial diesel vehicle idling) that are in effect during the implementation of the proposed project. Compliance with the PERP and applicable ATCMs would ensure that pollutant emissions in engine exhaust do not exceed applicable State or federal air quality standards.

Implementation of SDG&E protocols would reduce potential emissions to less than significant levels. After the proposed project is constructed, maintenance vehicles would operate at comparable frequencies and levels as existing conditions and would, therefore, not increase emissions associated with maintenance. Therefore, the proposed project would not contribute substantially to an existing or projected violation and impacts would be less than significant.

3. **Less Than Significant Impact**. As discussed in Item 1 above, the region in which the project is proposed is designated by State and federal air quality standards as nonattainment for ozone, PM_{10}, and $PM_{2.5}$. Short-term construction and long-term operation of the proposed project and affected substations would not contribute substantially to significant air quality violations. As referenced above, construction equipment would be limited to portable engines and vehicles, and hydraulic rock drilling and splitting procedures that are compliant with State and federal emissions standards and are not expected to result in a cumulatively considerable net increase of nonattainment criteria pollutants in the project region. Furthermore, SDG&E standard operating procedures and protocols are incorporated into the proposed project and minimize potential air quality impacts.

   The potential for this project to contribute to greenhouse gases (GHGs) and global climate change is anticipated to be minimal because emissions are short-term and temporary and mainly associated with the construction phase of the project. Attachment C includes a summary of GHG emissions data. The following discussion reviews project-related GHGs and the project's potential generation of these gases:

   California Assembly Bill AB 32 requires statewide GHG emissions reductions to 1990 levels by 2020. Though these statewide reductions are now mandated by law, permanent GHG emission thresholds have not been established. Final guidance on global climate change analysis in CEQA documents is not yet available. In order to determine whether or not a proposed project would cause a significant effect on the environment, the impact of the project must be determined by examining the types and levels of GHG emissions generated. GHG emissions related to utility pole replacements would be mainly from carbon dioxide (CO2), nitrous oxide (N2O), and methane (CH4) contained in exhaust from off-road diesel construction equipment/vehicles (e.g. idling and operation of drilling rigs and water trucks), from on-road trucks used by vendors (to deliver materials to the

site) and on-site workers, and from use of portable equipment (e.g. air compressors). These activities would be short-term and would not contribute to regional GHG emissions or climate change impacts. The short-term GHG emissions - CO2 equivalent (over the approximately 2 month project period) are estimated at 156 metric tons (using the URBEMIS 9.2.4 model, California Climate Action Registry and CARB emission factors -- in conjunction with estimated vehicle/equipment usage schedules and acreage of active pole replacement worksites) – see Attachment C. Long-term operation of the transmission lines would consist of maintenance activities that occur at approximately the same frequency as the existing conditions and therefore would not add to the existing GHG emissions.

The construction emissions of GHG from this project are not significant because they are temporary and are further mitigated by the implementation of the CARB's recently imposed restrictions on diesel vehicle idling and mandates on reduction of emissions from mobile sources. Two of the CARB's Early Action Measures (related to GHG reduction) directly address substantial mobile source emissions by imposing energy efficiency requirements (Pavely standards) and low carbon fuel requirements. The Pavely standards have already been issued and are awaiting a U.S. EPA waiver to go into effect. The low-carbon fuel standard was issued in April 2009.

The GHG emissions from the pole replacement project are well below significance thresholds thus far suggested (e.g. 10,000 metric tons/year for construction included in the South Coast Air Quality Management District suggested guidelines, December 2008; 7,000 metric tons/year by the CARB, October 2008). The emissions are also less than significant as compared to the system-wide reductions being pursued by SDG&E in accordance with its Long-Term Procurement Plan approved by the CPUC in September 2008 (an estimated reduction of 1,500,000 MTCO2E related to electricity procurement by 2016 is projected, Table V-1, Sheet Number 153). For these reasons, this project's contribution to global climate change is not cumulatively considerable and therefore the project's contribution to cumulative impacts would be less than significant.

The following SDG&E standard operating procedures and protocols are incorporated into the proposed project and will further minimize potential GHG impacts:

- All SDG&E employees and contractors will use vehicles that are in compliance with current CARB regulations for project activities.
- Traffic speeds on unpaved roads and the ROW will be limited to 15 mph.
- Vehicle idling time will be limited to a maximum of five minutes for vehicles and construction equipment, except where idling is required for the equipment to perform its task.

The allowable emissions from on-road and off-road vehicle and equipment exhaust are regulated by the State and Federal government agencies and are outside the control of this project. The proposed project would not result in any long-term on-site stationary sources

and would have little to no change in the off-site vehicle trips. Therefore, the proposed project would not generate any additional long-term GHG emissions. Greenhouse gas emissions are considered for their potential to contribute to global climate change. The proposed project will result in short-term emissions associated with the use of construction equipment. There will be no ongoing increase in contribution to global warming because there are no new on-site stationary sources, and there is essentially no increase in the number of vehicular trips coming to and from the project site. Therefore, the proposed project's contribution to global climate change in the form of GHG emissions is limited to construction equipment/vehicle emissions. The project will not result in a new, ongoing source of GHG emissions; therefore, the project's contribution to cumulative GHG emissions and global climate change is less than significant. SDG&E standard operating procedures and protocols are incorporated into the proposed project and minimize potential air quality impacts; therefore, no significant impacts would occur.

4. **Less Than Significant Impact.** Sensitive receptors include such uses as residences, schools, and places of worship. The project is located between the communities of Fallbrook and Pala. The closest schools to the project are Oasis High School in Fallbrook, and Sullivan Middle School in Bonsall. Oasis High School is approximately 1.6 miles north of the project, and Sullivan Middle school is approximately 2.0 miles southwest of the Old Highway 395 staging yard. The closest churches are Grace Presbyterian Church Fallbrook, which is approximately 0.5 mile north of the project, and Fallbrook United Methodist Church, which is approximately 1.25 miles north of the project. Other sensitive receptors, such as residences located within the transmission corridor, may be subject to temporary impacts associated with project construction. Project construction activities are not anticipated to result in the exposure of sensitive receptors to substantial pollutant concentrations because emissions from project construction activities would be minor, localized, and short-term, and would not generate substantial pollutant concentrations. The proposed project would employ SDG&E standard operational procedures and protocols to reduce potential air quality impacts to a less than significant level. Once the proposed project is constructed, maintenance vehicles would operate at approximately the same frequency as existing conditions. Therefore, future project operation would not generate or expose sensitive receptors to a significant amount of pollutant emissions, and impacts would be less than significant.

5. **Less Than Significant Impact.** Construction activities may generate some site-specific odors associated with vehicle and equipment exhaust, and refueling of vehicles and equipment. Because these emissions would be localized, short-term, periodic, and temporary, and because the project is in rural and rural residential areas, they would not adversely impact a substantial number of people in the areas affected by the proposed project. In addition, there would be limited use of gas or diesel-powered generators during construction. As a result, impacts related to objectionable odors would be less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. 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?	☐	☐	☒	☐
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
3. 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?	☐	☐	☐	☒
4. 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?	☐	☐	☒	☐
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Explanations:

1. **Less Than Significant.** SDG&E's NCCP serves as a long-term (55-year) agreement between SDG&E and the USFWS and CDFG. The NCCP provides for the preservation and conservation of listed species and their habitats, while allowing SDG&E to maintain, operate, and repair its facilities within the subregional plan area. The proposed project has the potential to result in temporary and permanent habitat modification for sensitive species identified by the USFWS and CDFG. However, all construction and operation activities would be conducted in accordance with SDG&E's NCCP, which outlines mitigation, avoidance, and minimization measures. TRC conducted a biological survey of the project impact areas and prepared a subsequent PSR dated June 15, 2009, to document the results and recommendations in accordance with SDG&E's NCCP (January 1995). The PSR is provided in Attachment B and includes a list of wildlife observed and more detailed habitat descriptions. In addition, SDG&E also hired a consultant (Pangea) to asses a portion of the project which falls on the northeastern border of designated critical habitat for the arroyo toad (*Anaxyrus californicus*) and least Bell's vireo (*Vireo bellii pusillus*).

   The project sites are located on flat land and gentle to steep slopes in developed (suburban residential and rural residential), planted groves, and natural areas and consist of coastal sage scrub, chaparral, coast live oak woodland, non-native grassland, disturbed habitat, ornamental, agricultural, and bare ground.

   Federal and State Listed Species. No federal- or state-listed threatened or endangered species have been observed on site. According to the Sensitive Species Geographic Information System (GIS) maps provided by SDG&E and a record search of the California Department of Fish and Game's California Natural Diversity Database (CNDDB), the following federal and/or state-listed species are known to occur in the vicinity of the project area within a three mile radius:

   - arroyo toad, Federally Endangered (FE), State Species of Special Concern (SSC)
   - coastal California gnatcatcher (*Polioptila californica*), Federally Threatened (FT), SSC
   - least Bell's vireo, FE, State Endangered (SE)
   - southwestern willow flycatcher (*Empidonax traillii extimus*), FE, SE

   The USFWS has designated critical habitat for the arroyo toad and the least Bell's vireo along the San Luis Rey River basin. A small portion of the project, which is just east of the intersection of Pala Road and Rice Canyon Road (comprised of three poles: 110013, 11014, and 110021), falls along the northern border of the critical habitat for these two species. According to the assessment conducted by Pangea, although these two species have been documented near the project area, little to no suitable habitat for either species exists at the pole sites (Pangea, 2009). Two of the poles lie along the disturbed road side, and the third pole is located in a disturbed area next to a residence. Riparian areas that have the potential to support arroyo toad are absent within the project boundaries. Upland

foraging habitat suitable for the potential to support arroyo toad is similarly absent within the project boundaries.

This portion of the project site also comes close (i.e., within 1000 feet) of critical habitat for the southwestern willow flycatcher. Impacts to this species are not expected to occur as the project does not fall directly within suitable habitat (i.e., riparian) for this species.

Potentially suitable habitat for coastal California gnatcatcher (*Polioptila californica californica*) occurs within a three mile radius of the project site in the form of disturbed and undisturbed patches of coastal sage. However, this species is not expected to occur onsite due to the lack of recorded observations listed in the CNDDB, lack of sufficient adequate coastal sage scrub along the alignment, and lack of observations during field surveys along the alignment. Therefore, no temporary or permanent impacts to suitable gnatcatcher habitat are anticipated due to project related activities.

***Other Special-Status Species*.** The following special-status species (including CDFG designations "California Species of Concern" [SSC], "Special Plants" [SP] and "Special Animals" [SA] designations) were detected on the project site: orange-throated whiptail (*Aspidoscelis hyperythra*) (SSC) and golden eagle (*Aquila chrysaetos*) (Fully Protected) were observed on the project site directly along the alignment. Orange-throated whiptail has recently been removed from the list of CSSs. No special-status plant species were observed within the project site.

Potentially suitable habitat for the following other special-status species was observed within the project site:

- coast (San Diego) horned lizard (*Phrynosoma coronatum blainvillii*) (SSC)
- coastal cactus wren (*Campylorhynchus brunneicapillus*), SSC
- Coronado skink (*Plestiodon skiltonianus interparietalis*), SSC
- least bittern (*Ixobrychus exilis*), SSC
- northern red-diamond rattlesnake (*Crotalus ruber*), SSC
- San Diego desert woodrat (*Neotoma lepida intermedia*),SSC
- tricolored blackbird (*Agelaius tricolor*), SSC
- yellow-breasted chat (*Icteria virens*), SSC
- yellow warbler (*Dendroica petechia*), SSC

NCCP Covered Species. The NCCP includes an ESA Section 10(A) permit and a CESA Section 2081 permit (for incidental take) with an Implementation Agreement with the USFWS and the CDFG, respectively, for the management and conservation of multiple species and their associated habitats, as established according to the federal and State Endangered Species Acts and California's Natural Community Conservation Planning Act.

Of the special-status species observed or with the potential to occur within the project site, the following are "covered species" pursuant to SDG&E's NCCP: orange-throated

whiptail, northern red-diamond rattlesnake, San Diego horned lizard, least Bell's vireo, and southwestern willow flycatcher. No NCCP-covered plants were observed during the survey. No other covered wildlife species, burrows, dens, nests, or nesting activities were observed during the survey. SDG&E's NCCP fully addresses impacts to all covered species except narrow endemics through field protocols and compensatory mitigation (off-site habitat preservation). No narrow endemic plant species were observed during field surveys. Therefore, project impacts to all covered species and narrow endemics would be less than significant.

Special-status species that are not "covered species" pursuant to SDG&E's NCCP were detected during field surveys. These species include Nuttall's woodpecker, and sharp-shinned hawk.

With the implementation of standard SDG&E protocols, avoidance and mitigation measures outlined in the NCCP, and the minimization measures provided below, all project impacts to special-status species and their habitat would be avoided or reduced to less than significant levels.

Avoidance and Minimization Measures. The project would incorporate avoidance and minimization measures by implementing the protocols of SDG&E's NCCP (Section 7.1, Operational Protocols). Additional project-specific minimization measures would be implemented to minimize impacts to resources due to project-related activities as follows:

[BIO-1]. *A biological monitor shall be present during all project-related activities at each site to assist crews in minimizing impacts to biological resources.*

[BIO-2]. *Crews shall implement appropriate BMPs in accordance with the Storm Water Pollution Prevention plan (SWPPP) and with the guidance from the SWPPP monitor.*

[BIO-3*]. All project related activities must comply with the Migratory Bird Treaty Act (MBTA). Active nests (i.e. nests with eggs or chicks) are protected year-round by MBTA. Project related activities that will require disturbance, removal of an active nest, or that causes a breeding bird to leave the nest for prolonged lengths of time are not permitted. Trimming or removal of vegetation during the peak-breeding season (February - August) requires a pre-activity survey by a qualified wildlife biologist to confirm that active nests will not be affected by work activities. If active nests are identified, the biological monitor shall inform the crews and call Todd Easley @ (858) 735-7152 prior to proceeding with project activities in the area of the active nest.*

[BIO-4]. *If crews find any active nest within the work site they shall not disturb or impact the nest. A biological monitor shall be notified of the active nest and verify the location and if it is active. If the nest is active, the monitor will notify SDG&E prior to any additional project activity within the area of the active nest.*

[BIO-5]. *All vehicles and equipment shall remain within designated off-site laydown areas, helicopter landing sites, as well as existing dirt, paved access roads (including parking lots), and previously disturbed areas for the duration of the project. No new access roads or spur roads shall be established as a result of this project. Access to some site will require overland travel or travel on mowed vegetation. These areas shall be cleared by the biological monitor prior to any work at these locations/sites.*

[BIO-6]. *All drainages will be avoided and flagged for avoidance by a qualified biologist. If re-grading is necessary on existing access roads, crews will lift the blade 25 feet before and after the flagged drainage crossing. BMPs shall be placed appropriately as mentioned above (item 3). Access roads to poles that have drainages that will be flagged for avoidance prior to any work performed are located near or adjacent to the following sites: 119271, 219213, 219214, 219215, and 219368.*

[BIO-7*]. All staging areas, laydown areas, and helicopter landing pads will be located on disturbed ground with appropriate BMPs in place. A biological monitor will clear the areas before they are used.*

[BIO-8]. *A post-construction biological survey shall be performed of all proposed work areas to document any deviations from this plan. Deviations may include refining access to poles.*

[BIO-9]. *Work crews should keep temporary work areas within previously disturbed areas at the base of the pole and not exceed larger than the 314 square foot temporary work area around each single pole structure.*

[BIO-10]. *All materials and project-related debris (including flagging placed by biologists) shall be removed from the project site and properly disposed of at an appropriate offsite location.*

[BIO-11]*. To minimize impacts to other sensitive wildlife species (i.e. reptiles) that may occur along dirt access roads, workers should limit vehicle speeds to less than 15 miles per hour.*

2. **Less Than Significant.** The proposed project is not expected to impact any riparian habitat. However, temporary and permanent impacts to NCCP-covered habitats are expected with implementation of the proposed project.

   NCCP-covered habitats that would be subject to impacts by the proposed project include coastal sage scrub, chaparral, and coast live oak woodland. The project would result in a total of 7.5 square feet of permanent impacts, and 463.5 square feet of temporary impacts to covered (native) habitats. As a result of project-related activities, SDG&E proposes to mitigate for 7.5 square feet of permanent impacts to native vegetation habitats at a ratio of 2:1 (equal to 15 square feet), and 553.5 square feet of temporary impacts to native habitats as a result of all combined project-related activities. Therefore, SDG&E proposes

to drawdown a grand total 568.5 square feet of credit from the mitigation bank to mitigate for all impacts, both permanent and temporary, to native habitats as a result of all combined project-related activities.

Because no riparian habitats will be impacted, and impacts to other sensitive natural communities will be mitigated for under the NCCP, impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service will be less than significant.

3. **No Impact.** Several unnamed drainages, features potentially subject to the jurisdiction of the ACOE, CDFG, and RWQCB, are located throughout the project area. However, because these features are located far enough away from where ground disturbance is proposed, and because all appropriate BMPs would be implemented to prevent off-site sedimentation, no potentially jurisdictional areas, including federally protected wetlands as defined by Section 404 of the Clean Water Act (waters or wetlands), would be affected as a result of project-related activities. Therefore, no impacts to waters or wetlands of the United States would occur.

4. **Less Than Significant.** Public utility and electric transmission facilities are generally compatible with sensitive wildlife movement corridors. The proposed project would be located within an existing SDG&E utility ROW and would not cross any large bodies of water. The addition of new steel structures to replace existing facilities would not result in significant impacts to migrating birds. These activities, once completed, would not result in impediments to wildlife movement or substantially change the character of the overall environment.

   Portions of the project area include native and ornamental vegetation that may provide suitable nesting habitat for various bird species. Raptors and other large birds may nest on utility poles. Two golden eagles were observed roosting on one pole and in eucalyptus trees nearby, but no nests or nesting behavior by those birds were observed. SDG&E would comply with SDG&E's Avian Protection Plan (January 2005), which would reduce potential impacts to raptors to a less than significant level. Other common wildlife species may breed in burrows or dens in the vicinity of the project area. The project area does not include any unique wildlife nursery sites that are not available elsewhere. SDG&E's NCCP requires avoidance of impacts to nesting birds and minimization of impacts to burrows and dens. Because any impacts that could occur despite implementation of the NCCP protocols (e.g., impacts to burrowing mammals and reptiles) would be to species that are relatively abundant throughout the area and region, they would be less than significant.

   Regional wildlife movement would not be impeded due to the proposed project activities and therefore would not result in significant impacts through loss of protective cover, roosts, forage habitat, or movement corridors. Because any loss is minimal, and SDG&E

would implement NCCP provisions and SDG&E standard operational procedures and protocols, potential impacts would be reduced to less than significant levels.

5. **No Impact.** SDG&E communicates with local land use authorities and obtains nondiscretionary permits protecting biological resources, such as tree preservation permits, when required. The proposed project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Additionally, SDG&E operates under its own NCCP, established according to the Federal and State Endangered Species Acts and California's Natural Community Conservation Planning Act, therefore proposed pole replacements are not expected to conflict with any State or local policies or ordinances protecting biological resources included as part of applicable city, community, or general use plans, or with the provisions of an adopted Habitat Conservation Plan (HCP), Multiple Species Conservation Program (MSCP), or other approved local, regional, or State HCPs, such as the San Diego County MSCP. Furthermore, SDG&E's NCCP supersedes other area HCPs in the event of a conflict. Therefore, no impacts would result from a conflict with such plans or policies.

6. **No Impact.** As stated above, SDG&E operates under its own NCCP, established according to the federal and State Endangered Species Acts and the State's Natural Community Conservation Planning Act. In the event of a conflict, SDG&E's NCCP would supersede other applicable plans, including the San Diego County MSCP. As a result, the proposed pole replacement would not conflict with the provisions of any HCPs, and no impacts are anticipated.

V. CULTURAL RESOURCES

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
2.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
3.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
4.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Explanations:

1. **Less Than Significant Impact**. A cultural resource assessment for TL 698 was conducted by engineering-environmental Management, Inc. (e^2M) in May and June of 2009. The full report is provided in Attachment D. The assessment included a review of archaeological records for the project area, as well as a pedestrian survey at each of the staging areas and within a 40-foot radius of each pole location. The assessment indicated there are two known historical resources located in the vicinity of the project (e^2M, 2009). One site consists of a single bedrock milling feature with one shallow mortar; no artifacts were identified in association with the milling feature. The bedrock milling feature is located approximately midway between poles 219373 and 219374, at an adequate distance that the feature would not be impacted by project activities (e^2M, 2009). The second site consists of a habitation site near pole 110015. The survey did not identify any surface expression of the resources; however, its proximity to the proposed work area indicates there is potential for impacts to this cultural resource from the proposed project. Specifically, there may be intact, buried areas of these sites, which contain significant data within and adjacent to the project area. The likelihood of significant buried archaeological deposits within this area of the project is considered to be low according to e^2M. However, the presence of the previously recorded materials is an indicator that monitoring is an appropriate management consideration. To manage the potential for possible discovery during construction proactively, the following minimization measure would be incorporated into the project:

[CUL-1]. *A qualified archaeological monitor and a Native American representative will be present during ground-disturbing activities at pole 110015. The presence of qualified cultural resource monitors and Native American representatives at pole 110015 during ground-disturbing activities will ensure a timely and responsible management of any discoveries. The area to be monitored should be indicated on project plans and flagged by the contracted monitor and the subcontractor's environmental coordinator to alert construction crews not to conduct ground-disturbing activities without the presence of an archaeological monitor and Native American representative. The contracted monitor should be notified 48 hours prior to the commencement of ground-disturbing activities and will coordinate with the Native American representative and the subcontractor's environmental coordinator for the monitoring schedule. In the event of a discovery, the monitor will request that work cease in the area of concern and will contact SDG&E environmental staff immediately to determine the appropriate course of action. The monitor should not complete any additional work at a discovery without prior authorization from SDG&E. In the event that imported fill or subsurface bedrock is identified during ground-disturbing activities, the archaeologist may cease monitoring.*

With implementation of these avoidance measures, adverse impacts to cultural resources will be less than significant.

2. **Less Than Significant Impact.** See response to Item 1 above.

3. **Less Than Significant Impact**. A paleontological records search conducted for the project found that there are no known unique paleontological or geologic features within the project's area of potential effect (APE) (Kesler, 2009). The full report is provided in Attachment E. In addition, project activities, such as grading at laydown areas and the installation of new poles, would not impact ground surfaces at substantial depths penetrate geological and paleontological formations. Therefore the potential to inadvertently discover such a feature is low and the impacts associated with destroying a unique paleontological resource or site or unique geologic feature is less than significant.

4. **Less Than Significant Impact**. Because no cemeteries or recorded Native American or other human remains were identified within or adjacent to the project sites, the potential for the inadvertent discovery of Native American or other human remains during subsurface construction is low. However, if human remains are encountered during construction, State Health and Safety Code §7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code §5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. SDG&E is

committed to complying with all applicable federal, State, and local regulations. Implementation of standard operational procedures would ensure that any impacts to human remains would be less than significant.

VI. GEOLOGY AND SOILS

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Expose people or structures to potential adverse effects, including the risk of loss, injury or death involving: a. 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.	☐	☐	☒	☐
	b. Strong seismic ground shaking?	☐	☐	☒	☐
	c. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	d. Landslides?	☐	☐	☒	☐
2.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
3.	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?	☐	☐	☒	☐
4.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	☐	☐	☐	☒
5.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Explanations:

1a. **Less Than Significant Impact**. No known active faults or mapped Alquist-Priolo Earthquake Fault Zones (EFZ) are located in the immediate vicinity of the proposed project. The nearest EFZ, the Elsinore Fault Zone, is located approximately 5 miles northeast of the proposed project (California Geological Survey 2007). The proposed project is not located within the immediate vicinity of a fault zone, thus impacts related to fault rupture are not anticipated to be significant.

1b. **Less Than Significant Impact**. In the event of a major earthquake, the site could be subjected severe ground shaking. The Elsinore Fault Zone has historically produced earthquakes up to magnitude 6 (SCEC 2009). All proposed structures would be designed in accordance with the California Building Code (CBC) for the peak site ground acceleration. Impacts due to strong seismic shaking would be less than significant, as the proposed project would conform to the specific mandated structural design requirements to protect against strong seismic shaking.

1c. **Less Than Significant Impact**. Liquefaction is not known to have occurred in San Diego County (County of San Diego 2007). Within the County, there may be a potential for liquefaction in areas with loose sandy soils combined with a groundwater table, which typically are located in alluvial plains. Liquefaction hazard areas were mapped in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (2004). There is potential for liquefaction at the eastern end of the proposed alignment (specifically at existing poles 610860, 414512, 110011, 110013, 110014, 110015 and 110021). Design requirements would mitigate any potentially liquefiable soils encountered. Therefore, impacts related to seismic-related ground failure, including liquefaction, are anticipated to be less than significant.

1d. **Less Than Significant Impact**. Landslide hazard areas were mapped in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (2004). The proposed project is not located on a slide-prone- geologic formation, and is not within a delineated landslide hazard area (San Diego County 2004). The proposed project would involve minimal soil disturbance as existing access roads and pole sites would be utilized. Therefore, impacts related to landslides are anticipated to be less than significant.

2. **Less Than Significant Impact**. The proposed project would not result in substantial soil erosion or the loss of topsoil. A Storm Water Pollution Prevention Plan (SWPPP) would be developed, and then implemented during all phases of construction. The SWPPP would detail the deployment of Best Management Practices (BMPs) that would avoid and/or minimize soil erosion. Therefore, the utilization of BMPs would reduce the potential for impacts due to soil erosion, and loss of topsoil, to less than significant.

3. **Less Than Significant Impact**. The proposed project work would consist of removing and replacing existing utility pole structures. As mentioned above, there is potential for liquefaction at the eastern end of the proposed alignment (specifically at existing poles

610860, 414512, 110011, 110013, 110014, 110015 and 110021), however design requirements would mitigate any potentially liquefiable soils encountered (County of San Diego 2004). The proposed project would not impact the existing geologic stability of the area and there would be no potential impacts to geologic stability.

4. **No Impact.** According to the County of San Diego Guidelines for Determining Significance Geologic Hazards, impacts associated with expansive soils would be considered significant if the project is located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, and does not conform with the Uniform Building Code (County of San Diego, 2007d). Isolated segments of the proposed project alignment are located on potentially expansive soils, however the proposed project involves the replacement of existing utility poles and no new structures intended for human occupancy would be constructed. Impacts due to expansive soils are not anticipated, as the proposed project would conform to any specific mandated structural design requirements to protect against expansive soils.

5. **No Impact**. The proposed project consists of the removal and replacement of existing utility line poles. The project would not create new septic tanks or wastewater systems or increase demand for the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater. Therefore, there would be no impact with regard to on-site sewage disposal systems.

VII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
2.	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?	☐	☐	☒	☐
3.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
4.	Lie 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?	☐	☐	☒	☐
5.	Lie 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?	☐	☐	☒	☐
6.	Lie within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
7.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8.	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?	☐	☐	☒	☐

Explanations:

1. **Less Than Significant Impact.** Project activities would involve periodic and routine transport, use, storage, and disposal of minor amounts of hazardous materials, such as vehicle fuels (gasoline and diesel), oil, mobile fueling trucks, cartridges containing primer for ignition and nitrocellulose propellant for gas production, and other fluids (e.g., hydraulic fluid, antifreeze, transmission fluid, etc.) for construction equipment. To avoid inadvertent release of these materials, and for proper response actions, SDG&E would implement its standard operational procedures and protocols, including BMPs, to reduce potential impacts relative to hazardous material transport, use, storage, or disposal. In the event that the disposal or handling of a transformer is involved, SDG&E would implement standard spill cleanup procedures and dumping to an approved facility.

   SDG&E would ensure compliance with all environmental regulations managed by the San Diego County Department of Environmental Health. SDG&E would ensure compliance with any applicable rules and regulations, including the State of California CCR Title 23 Health and Safety Regulations, as managed by the San Diego County Department of Environmental Health. SDG&E shall implement its standard operational procedures and protocols, including BMPs, to reduce potential impacts relative to hazardous materials to less than significant levels. BMPs for vehicle and equipment fueling and spill control in accordance with the Water Quality Construction BMP will also be implemented for refueling activities at the staging yards. With these measures in place, transport, use, storage, and disposal of hazardous materials would not pose a significant hazard, and the impact would be less than significant.

2. **Less Than Significant Impact.** No significant risk of accidental upset or the release of hazardous substances is anticipated with the proposed project. This is because numerous safety systems that substantially minimize the risk of upset and ignition of flammable materials are integrated into the SDG&E electrical distribution system, including linked circuit breakers to cut off electrical power as a heat source or accelerant prior to attaining flash point, enclosed and isolated equipment locations within substation sites, and routine maintenance and troubleshooting of equipment and structures. Furthermore, implementation of vehicle and equipment fueling and spill control BMPs will minimize

potential impacts involving the release of fuel into the environment. In addition, SDG&E would ensure compliance with applicable rules and regulations and implement its standard operational procedures and protocols, as well as BMPs, to reduce potential impacts relative to hazardous materials to less than significant levels.

3. **Less Than Significant Impact.** The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The closest schools are Oasis High School and Sullivan Middle, which are 1.6 and 2.0 miles from the project, respectively. The hydraulic rock drilling and splitting procedure is not anticipated to result in the exposure of sensitive receptors to hazardous materials because emissions from the procedure would be minor, localized, short-term, and non-toxic (non-hazardous under OSHA 29 CFR 1910.1200, McCarthy Industries & JRM Chemical, Inc. Project construction activities are not anticipated to result in a release of hazardous emissions, hazardous or acutely hazardous material or substances in the vicinity of sensitive receptors due to implementation of standard operational procedures and protocols, as well as BMPs. SDG&E will also ensure compliance with any applicable rules and regulations. Impacts are anticipated to be less than significant.

4. **Less Than Significant.** A review of federal and state databases and lists, including lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 for environmental concerns, did not reveal any active hazardous materials sites directly within the project ROW or staging yards (DTSC 2007, SWRCB 2008, USEPA 2008). Therefore impacts are less than significant. Results from database searches are provided in Attachment F.

5. **Less Than Significant Impact.** Six project pole sites are located between 1.7 to 2.0 miles southeast of the Fallbrook Community Airpark. The State of California has published guidelines with respect to safety zones around airports which include land use guidelines and density limits for development within the safety zones. As proposed, the project is not a new land use but the maintenance of an existing land use within SDG&E's ROW with no substantial changes to the existing use or the maintenance requirements necessary to maintain the pole structures. As such, the project will not result in any safety hazards for residents residing or working in or near the project area.

6. **No Impact.** The project does not lie within the vicinity of a private airstrip and therefore would not result in a safety hazard for people residing or working in the project area.

7. **Less Than Significant Impact.** The proposed project would not interfere with emergency response plans or operations near or within the areas affected by the proposed project. During construction, streets may be temporarily closed and traffic control would be required. The presence of traffic control personnel would ensure adequate emergency access. Traffic control plans would be prepared in accordance with SDG&E protocol and would be approved by the County to ensure no interference with emergency access or evacuation.

A helicopter landing site is located near the project alignment on Via Monserate. SDG&E would follow standard notification protocols and flight paths would be coordinated with local air traffic control (i.e., Federal Aviation Administration) to ensure that no conflicts with other air traffic occur.

During an emergency response, aircraft tend to fly low to the ground, thus increasing the potential hazards to aircraft from towers and other objects within the airspace. According to the County of San Diego Guidelines for Determining Significance for Emergency Response Plans (2007c), certain tall structures can physically interfere with the implementation of an emergency response if the height of the structure or tower interferes with the ability of emergency air support services to carry out missions associated with an emergency response. The Guidelines (County of San Diego, 2007c) state the significance threshold as a project that proposes, "a structure or tower 100 feet or greater in height on a peak or other location where no structures or towers of similar height already exist and as a result, the project could cause hazards to emergency response aircraft resulting in interference with the implementation of an emergency response." The proposed steel poles would be located as close as possible to the existing wood poles to be removed. The proposed project would not replace any existing wood poles with steel poles greater than 100 feet in height where existing poles do not currently exist. Therefore, impacts related to emergency response are considered less than significant.

8. **Less Than Significant Impact.** The replacement of wood poles with steel poles is being undertaken to minimize the risk of wildfire that exist in high risk fire areas. The proposed project is consistent with SDG&E's long-term plan to improve service reliability in fire-prone areas through system hardening or other enhancements. There is the risk that fires would be initiated during construction activities. All construction and maintenance activities including the hydraulic rock drilling and splitting procedure, and the on-site mobile refueling, would be conducted in compliance with standard safety protocols, which would minimize the potential release of flammable materials (including fuel, lubricants, paint, and solvents). Implementation of standard SDG&E operational procedures and protocols would reduce the risk of fire to a less than significant level.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
2.	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 preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
3.	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?	☐	☐	☒	☐
4.	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 that would result in flooding on- or off-site?	☐	☐	☐	☒
5.	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?	☐	☐	☒	☐
6.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
7.	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?	☐	☐	☐	☒

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
9.	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?	☐	☐	☒	☐
10.	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Explanations:

1. **Less Than Significant Impact.** The proposed project would not violate any water quality standards or waste discharge requirements. The hydraulic rock drilling and splitting procedure uses only a small amount of water; approximately one-third of a gallon. Deeper holes may use slightly more water and may require the use of a thickening agent (polymer). The polymer (Soil Moist) is typically used in soil modification to retain moisture in the soil and is not toxic (JRM Chemical, Inc.). Both the water and the water polymer solution are consumed during the procedure. No hazardous fumes are created by the process (non-hazardous under OSHA 29 CFR 1910.1200, McCarthy Industries & JRM Chemical, Inc.). No new sources of point discharge water pollution would result from the proposed construction and upgrade of the existing transmission line. Stormwater discharges from construction activities would be controlled in accordance with the State's National Pollutant Discharge Elimination System (NPDES) Construction Permit and SDG&E standard operating procedures and protocols. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented during construction activities, in compliance with the NPDES Construction Permit requirements**.** The SWPPP identifies construction BMPs from SDG&E's Water Quality Construction Best Management Practices Manual*,* to be implemented as part of the proposed project to reduce impacts to water quality during construction activities. The SWPPP will also include vehicle and equipment fueling and spill control BMPs for the on-site refueling component of the project. Implementation of BMPs during construction would minimize potential impacts to water quality. In addition, as part of the proposed project, SDG&E would provide monitoring of the water quality BMPs. SDG&E monitors would provide oversight to crews who install the BMPs and conduct routine inspections of disturbed areas to ensure that the BMPs remain intact and effective. To ensure compliance with the state General Construction Storm Water Permit, monitors would provide training, document inspections, and maintain the project's SWPPP to ensure that the project

remains in compliance with SWPPP requirements**.** Therefore, with implementation of construction BMPs, impacts related to violation of water quality standards or waste discharge requirements would be less than significant.

2. **No Impact.** The proposed project would not withdraw groundwater or result in discharge from the sites into the existing groundwater table. No existing water quality conditions would be adversely affected. Therefore, no impacts related to groundwater supplies would occur.

3. **Less Than Significant Impact.** The proposed project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off site. Erosion and siltation would be controlled and minimized, as discussed above, through the implementation of SDG&E standard operating procedures and protocol and BMPs, to be documented in the SWPPP. Additionally, SDG&E would obtain any necessary regulatory approvals to reduce potential impacts related to erosion and siltation to a less than significant level.

4. **No Impact.** The proposed project would not substantially alter the existing drainage patterns of the affected areas in a manner that would result in flooding on or off site. Therefore, no impacts related to flooding are anticipated.

5. **Less Than Significant Impact**. The proposed project would not contribute a substantial amount of runoff that would exceed the capacity of the existing or planned storm water drainage systems. Because potential pollution sources associated with the proposed project (e.g., oil-filled transformers) would be equipped with spill containment structures incorporated into the project design, the proposed project would not result in substantial additional sources of polluted runoff. Additionally, in accordance with standard operating procedures and protocols, SDG&E would prepare a SWPPP and implement construction BMPs in order to avoid and minimize potential impacts to water quality. With implementation of SDG&E standard operating procedures and protocols and implementation of construction BMPs, the proposed project would not exceed the capacity of the planned storm water drainage systems and would not contribute substantial additional sources of polluted runoff; therefore, impacts are considered less than significant.

6. **Less Than Significant Impact.** The proposed project would not substantially degrade water quality. Project construction activities have the potential to contribute to water quality impacts. However, implementation of SDG&E standard operating procedures and protocols, including BMPs, would reduce potential impacts to water quality to a less than significant level.

7. **No Impact.** The proposed project does not involve the construction of housing. Therefore, there would be no impacts related to placement of housing in a 100-year floodplain.

8. **No Impact.** According to Federal Emergency Management Agency (FEMA) Flood Plain Maps, four of the project poles are located within the 100-year flood hazard area. Each of these poles are located approximately 1000 feet north of the San Luis Rey River, between Rice Canyon Road and Pala del Norte Road in Pala. Although the project does entail placing structures within the 100-year flood hazard area, the structures (i.e., poles) would not impede or redirect flood flow. Therefore, no impacts to 100-year floodplains would occur.

9. **Less Than Significant Impact.** The project alignment crosses the FEMA 100-year flood hazard area near the San Luis Rey River in Pala; however, the proposed upgrades would not result in exposure of people or structures to a risk of significant loss from flooding due to the character of the work required (i.e., removal and installation of poles within the SDG&E ROW). According to the County of San Diego Guidelines for Determining Significance for Emergency Response Plans (2007c), a proposed project activity would be considered significant if, "the project proposes one of the following unique institutions in a dam inundation zone as identified on the inundation map prepared by the dam owner:

   - Hospital
   - School
   - Skilled nursing facility
   - Retirement home
   - Mental health care facility
   - Care facility with patients that have disabilities
   - Adult and childcare facility
   - Jails/detention facility
   - Stadium, arena, amphitheater
   - Any other use that would involve concentrations of people that could be exposed to death in the event of a dam failure."

   The proposed project would not construct any of the above unique institutions within a dam inundation zone, nor does the pole replacement project involve concentrations of people. Therefore, impacts related to loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or a dam, would be less than significant.

10. **No Impact.** The project, due to its inland location and surrounding land characteristics, has a low potential for being exposed to inundation by a seiche, tsunami, or mudflow. Nor are project activities (e.g., removal and installation of poles) of a nature to cause or increase harm to the public in regards to inundation by a seiche, tsunami, or mudflow. Therefore, no impacts related to seiche, tsunami, or mudflow would occur.

IX. LAND USE AND PLANNING

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Physically divide an established community?	☐	☐	☐	☒
2.	Conflict with any applicable land use plan, policy, or regulation or 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?	☐	☐	☐	☒
3.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Explanations:

1. **No impact.** The existing TL 698 does not divide any established communities. The project, which entails pole replacements, would not alter the location of the line or cause it to divide any established community.

2. **No impact.** No changes in land use or zoning are required with the project activities. Project activities along the project alignment would be limited to the removal and replacement of poles and would primarily occur within SDG&E property or ROW. Temporary staging areas located outside SDG&E ROW and/or easements are needed to support the proposed project. SDG&E communicates with local agencies (i.e., the County of San Diego) about the use of these temporary staging areas to ensure the avoidance of any temporary land use impacts. Therefore, project activities would not conflict with any applicable land use plan, policy, or regulation and no impacts would occur.

3. **No Impact.** SDG&E will conduct all work in accordance with its NCCP. Therefore there will be no impact related to HCPs or NCCPs with implementation of the project.

X. MINERAL RESOURCES

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	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?	☐	☐	☐	☒
2.	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?	☐	☐	☐	☒

Explanations

1. **No Impact.** The proposed project would not create any new structures that would prevent the availability of resource extraction. Therefore, the proposed project would not impact the availability of a known mineral resource that would be of value to the region and the residents of the state.

2. **No Impact.** The proposed project would not create any new structures that would prevent the availability of a locally important mineral resource recovery site. Therefore, the proposed project would not impact the availability of a locally-important mineral resource recovery site.

XI. NOISE

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	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?	☐	☐	☒	☐
2.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
3.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
4.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
5.	Lie within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
6.	Lie in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Explanations:

1. **Less Than Significant Impact.** The project alignment consists mainly of residential, rural residential and undeveloped areas. Sensitive noise receptors include nearby residences, schools, places of worship, and recreational trails. The nearest sensitive receptors are residences along the alignment are Grace Presbyterian Church Fallbrook, which is approximately 0.5 mile north of the project, and Fallbrook United Methodist

Church, which is approximately 1.25 miles north of the project. Construction activities will involve the use of noise-generating equipment such as augers, drill rigs, hand jacks hydraulic rock drilling and splitting equipment, a helicopter, and chainsaws. A site on Via Monserate will be established for a helicopter landing and refueling. Noise levels from construction activities could constitute a potential short-term impact to nearby land uses along the project alignment. In general, construction noise would be short-term and intermittent and therefore, are not anticipated to exceed established standards and would be in accordance with County noise ordinances.

The San Diego County Code of Regulatory Ordinances Sections 36.404, 36.410, and 36.414 regulate noise in the County. Under these rules, average hourly noise in residential areas is limited to 50–55 A-weighted decibels (dBA) from 7:00 a.m. to 10:00 p.m. and to 45–50 dBA from 10:00 p.m. to 7:00 a.m. These limits disallow sources of noise that cause more than 53 dBA community noise equivalent level (CNEL) on a day-night basis and apply at or beyond six feet from the boundary of the easement for the transmission line. Construction equipment operation is prohibited daily between the hours of 7:00 p.m. and 7:00 a.m. and on Sundays and holidays, unless approved by the local jurisdiction. Daytime audible levels for construction equipment are limited to 75 dBA and below. Although the County ordinances establish limits on groundborne vibration, vibration that is caused by short-term, temporary construction is exempt from the standards.

The County of San Diego General Plan establishes the CNEL as the appropriate unit of measure for the cumulative effects of community noise. The CNEL is the energy average noise level in dBA over a 24-hour period with a 5-decibel penalty assigned to evening noise (7:00 p.m. to 10:00 p.m.) and a 10-decibel penalty assigned to nighttime noise (10:00 p.m. to 7:00 a.m.).

Typical noise levels resulting from project construction would be made up of intermittent peaks and continuous lower-level noise during construction activities. Noise levels from individual pieces of heavy equipment or a helicopter would generally range between 70 and 90 dBA at 50 feet from any work site, up to 78 dBA at 200 feet from any work site, and no more than 70 dBA beyond 1,000 feet from any work site. Loud noise associated with heavy construction equipment would occur intermittently over short periods of time. The average noise level over a 24-hour period is unlikely to exceed the County thresholds.

Construction activities may be required outside of normal construction hours in order to minimize impacts on schedules and facilitate cutover work, which would require outages of certain portions of the electric system. SDG&E communicates with local agencies (i.e., the County of San Diego) about the proposed project and the nature of the construction schedule, which may involve construction during hours outside of those normally allowed by the County, and would incorporate the following minimization measure into the project:

[NOI-1]. *To the extent feasible, unnecessary construction vehicle and idling time would be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles such as large, diesel-powered vehicles have extended warm-up times following startup that limit their availability for use following startup. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project will apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine would be shut off. Construction foremen will include briefings to crews on vehicle use as part of pre-construction conferences. Those briefings would include discussion of a "common sense" approach to vehicle use.*

On occasion, hydraulic rock drilling may be used to minimize drilling time at new pole locations. Noise associated with this non-blasting procedure is minimal, short in duration, infrequent, and the procedure does not result in any ground vibrations. Compliance with SDG&E's NCCP avoidance and minimization measures would ensure that impacts to nesting birds do not occur, as discussed in the Biological Resources section of this report. Therefore, impacts would be less than significant.

Federal law protects workers from excessive noise exposure via regulations established by the Occupational Safety and Health Administration (OSHA). SDG&E protocol ensures worker safety measures are implemented that meet OSHA guidelines.

Noise levels associated with operational activities would not exceed established standards for the County. Short-term operational noise may be generated when regular or emergency maintenance is needed; however, this is consistent with existing conditions, as periodic maintenance of the existing circuit is conducted. The existing transmission line is currently operational and no new noise-generating facilities are being added.

Noise impacts related to construction activities have the potential to affect breeding and nesting behavior of avian species. Compliance with SDG&E's NCCP avoidance and minimization measures would ensure that impacts to nesting birds do not occur as discussed in Section IV, Biological Resources.

The proposed project would not 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. Impacts related to noise standards would be less than significant.

2. **Less Than Significant Impact.** On occasion when rock is encountered, a hydraulic rock drilling and splitting procedure is used to minimize drilling time. As the cartridge is non-blasting and the drill site is covered with a flexible mat, the noise associated with this procedure is minimal and infrequent, and ground vibrations are not present. As this procedure reduces the drilling time, the overall hourly average of noise levels associated with project construction would be lower compared to traditional drilling techniques. No

blasting or other groundborne vibration-generating activities are expected on this project. Therefore exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels is not anticipated and impacts would be less than significant.

3. **No Impact.** The proposed maintenance activities at these sites would not permanently increase ambient noise levels above those that presently exist. Therefore, there are no impacts associated with a substantial permanent increase in ambient noise levels in the areas affected by the proposed project, above levels existing levels.

4. **Less Than Significant Impact.** Although construction activities at the project sites would result in potential periodic noise levels above ambient conditions, such impacts would be temporary, localized, short-term, and intermittent. SDG&E would implement standard operational procedures and protocols to reduce the potential for noise impacts to occur during the construction phase of the project. With implementation of SDG&E standard operational procedures and protocols, construction noise impacts would be less than significant.

5. **Less Than Significant Impact.** A portion of the project, which includes six poles, is within two miles of a public use airport. The project is not expected to expose people residing or working in this portion of the project to excessive noise levels because noise generating activities will be intermittent and are temporary in nature. Therefore impacts will be less than significant.

6. **No Impact.** The project area is not located within the vicinity of a private airstrip and would not expose people residing or working in the area to excessive noise levels. Therefore, no impacts would occur due to airport-generated noise.

XII. POPULATION AND HOUSING

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	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)?	☐	☐	☒	☐
2.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
3.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Explanations:

1. **Less Than Significant Impact.** The project would have no significant impact on population growth or housing. The project would increase the reliability of existing electrical service to current users. The project would not increase capacity or extend service, and therefore would not induce further population growth in the area. Impacts relating to growth would be less than significant.

2. **No Impact.** The project would not displace existing housing or people. Therefore, no impacts related to housing displacement would occur.

3. **No Impact**. See response to Item 2 above.

XIII. PUBLIC SERVICES

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	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:				
a)	Fire protection?	☐	☐	☒	☐
b)	Police protection?	☐	☐	☒	☐
c)	Schools?	☐	☐	☐	☒
d)	Parks?	☐	☐	☐	☒
e)	Other public facilities?	☐	☐	☐	☒

Explanations:

1a. **Less Than Significant Impact.** The project is an unmanned utility project, and no new or altered governmental services would be required. In case of an emergency during construction, adequate fire and police protection can be provided to the site because the site is located within or near existing urbanized areas, and because fire and police protection are available for the existing line. The addition of traffic associated with construction could temporarily affect emergency response times. However, in most locations throughout the project site, vehicles and equipment would be staged on unpaved access roads and in staging areas located away from existing thoroughfares used by emergency vehicles. Traffic control plans would be implemented where poles are located along roadways, or where the location of equipment would require traffic control. All roads would remain open to emergency service providers, and appropriate traffic control plans for all phases of construction would be filed with the local land use authority (e.g., County of San Diego). As a result, impacts related to emergency service providers would be less than significant.

1b. **Less Than Significant Impact.** See response to Item 1a above.

1c. **No Impact.** The project does not result in the need for new schools, parks, or other public facilities and would not interfere with the use of existing facilities. Therefore, no impacts to public facilities are anticipated.

1d. **No Impact.** See response to Item 1c above.

1e. **No Impact.** See response to Item 1c above.

XIV. RECREATION

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	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?	☐	☐	☐	☒
2.	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Explanations:

1. **No Impact.** The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities, and therefore would not cause or accelerate the physical deterioration of any recreational facility.

2. **No Impact.** The project does not include recreational facilities or require the construction or expansion of any existing recreational facilities which might have an adverse physical effect on the environment.

XV. TRANSPORTATION AND TRAFFIC

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
2.	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
3.	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?	☐	☐	☒	☐
4.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
5.	Result in inadequate emergency access?	☐	☐	☒	☐
6.	Result in inadequate parking capacity?	☐	☐	☐	☒
7.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

Explanations:

1. **Less Than Significant Impact**. Project activities would not result in the generation of traffic that would substantially affect present patterns of circulation for the movement of people or goods. Long-term operation would generate fewer vehicle trips than existing conditions for maintenance purposes. However, local traffic may be temporarily affected

by the movement of construction vehicles and equipment to and from the areas where pole replacements would occur.

For areas where project construction activities may potentially affect traffic, SDG&E would prepare and implement a traffic control plan to ensure the efficient routing and movement of vehicle traffic through or around construction areas. The traffic control plan would be subject to approval by the County. If lane closures are necessary, flag persons would be in place as needed to control and direct traffic safely through the areas to ensure that only temporary, short-duration traffic delays would occur, if at all.

It is anticipated that approximately 50 vehicles would be at each staging yard including construction personnel vehicles and construction vehicles operating out of the staging yard. Construction personnel vehicles would make two trips daily: one trip to the staging yard at the beginning of the day and one trip from the staging yard at the end of each day. Each construction vehicle would make two trips daily: one trip from the staging yard at the beginning of the construction day and one trip back to the staging yard at the end of the construction day. Therefore, construction traffic would result in temporary increase of approximately 100 daily vehicle trips; however, due to the low volume and periodic nature of ingress and egress to the staging yards, impacts to existing roadways will be less than significant.

2. **No Impact.** Operational traffic associated with the proposed project is limited to maintenance and repair activities. No new maintenance activities would occur along TL 698 due to the pole replacement activities. Therefore, there would be no project-related increases to existing traffic volumes and associated levels of service.

3. **Less Than Significant Impact.** The proposed project would not significantly impact air traffic patterns. A helicopter may be used to facilitate installation of poles. If used, the helicopter would be based from the Via Monserate and Pala helicopter landing sites (the latter of which is associated with the Orange Grove Pala Reconductor Project). SDG&E would follow standard notification protocols, and flight paths would be coordinated with local air traffic control (Federal Aviation Administration) to ensure that no conflicts with other air traffic occur. As a result, project-related impacts on air traffic patterns would be less than significant.

4. **No Impact.** The proposed project would not require development of additional circulation routes, or introduce incompatible uses. Therefore no impacts related to traffic hazards as a result of hazardous roadway design features would occur.

5. **Less Than Significant Impact.** The proposed project would not result in inadequate emergency access to the areas where construction activities would occur, or within the nearby vicinity. SDG&E would prepare a Traffic Control Plan where project construction activities may impact traffic.

Details regarding emergency access related to low-flying aircraft are addressed in Section VII, Hazards and Hazardous Materials. Potential impacts related to low-flying aircraft in emergency response situations are less than significant. Therefore, impacts related to emergency access are considered less than significant.

6. **No Impact.** The proposed project would not result in an increased demand for parking space facilities on or off site. Construction parking would occur within existing SDG&E property, ROWs, or staging yards, and off-site parking would not be required. Therefore, no parking impacts would occur.

7. **No Impact.** The proposed project would not conflict with any alternative transportation policies or generate the need for such services. Therefore, no impacts to alternative transportation would occur.

XVI. UTILITIES AND SERVICE SYSTEMS

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
2.	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?	☐	☐	☐	☒
3.	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?	☐	☐	☒	☐
4.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
5.	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?	☐	☐	☒	☐
6.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
7.	Comply with federal, State, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Explanations:

1. **No Impact.** The proposed project is an unmanned utility project and would not generate additional wastewater, require any alteration of existing sewer systems or septic tanks, or affect wastewater treatment facilities. Therefore, no impacts to wastewater treatment requirements would occur.

2. **No Impact.** Replacement of the utility poles does not generate a demand for water services or wastewater facilities and services. No new landscaping or irrigation is proposed. Therefore the project will not result in significant environmental effects from the construction of new water or wastewater treatment facilities or expansion of existing facilities.

3. **Less Than Significant Impact**. The project is an unmanned utility project and would not generate a substantial amount of additional stormwater runoff because the amount of impervious area would not be substantially altered. The project would not result in the construction of new storm water drainage facilities or expansion of existing facilities, therefore impacts to stormwater drainage facilities would be less than significant.

4. **Less Than Significant Impact.** The project is an unmanned utility project and would not require a substantial amount of water supplies. Water will be obtained from existing sources and will not require any new or expanded entitlements. Therefore impacts to water supplies would be less than significant.

5. **Less Than Significant Impact.** The project is an unmanned utility project and would not generate a substantial amount of wastewater. It is anticipated that the wastewater treatment provider which serves or may serve the project will have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Therefore impacts to wastewater treatment providers would be less than significant.

6. **Less Than Significant Impact.** Operation of the project does not routinely generate any waste. During construction, waste due to pole removal would be generated. SDG&E would arrange profiling and disposal of solid waste as a result of demolition and construction. If SDG&E environmental staff (Site Assessment and Mitigation and/or Hazardous Materials) determines that the material is nonhazardous and qualifies as non-impacted, the contractor would handle the waste in accordance with federal, state, and local regulations. Treated wood products and all conductors, insulators, and other pole hardware would be recycled as appropriate and according to SDG&E Environmental Standard G8724. The conductors, hardware, and insulators would be sent to a metal recycler. The treated wood products would be donated with a "Treated Wood Sales Agreement" along with a Proposition 65 warning sheet about the hazardous products used for treating the wood and specifically identified uses for the treated wood products. The agreement is signed by SDG&E and the recipient.

There would be some treated wood products that may not be recyclable, and such wood products would be disposed of appropriately according to SDG&E Environmental Standard G8726. SDG&E Environmental personnel would arrange for bill-of-lading to accompany these poles. SDG&E standard operating procedures and protocols have been incorporated into the project; as a result any associated impacts to landfills would be less than significant.

7. **Less Than Significant Impact.** The project will comply with federal, state and local statutes and regulations related to solid waste as discussed in Item 6 above.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	Does the project have the potential to 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, 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?	☐	☐	☒	☐
2.	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).	☐	☐	☒	☐
3.	Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Explanations:

1. **Less than Significant Impact.** As discussed above in the Biological and Cultural Resources sections, a Biological Resources site investigation and a Cultural Resources Site Record and Archival Search and field investigation were conducted by TRC and E^2M, respectively (June 2009, June 2009). The findings of these reports indicate that while biological and cultural resources may exist within the project alignment, impacts associated with project activities would be less than significant. With implementation of standard SDG&E protocols, including compliance with the NCCP and implementation of recommended avoidance and minimization measures, as described in Section IV (Biological Resources), Section V (Cultural Resources), Section VII (Hazards and Hazardous Materials) and the PSR (Attachment C), impacts to biological resources will

be less than significant and would not cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The proposed project would not eliminate important examples of the major periods of California history or prehistory with implementation of standard SDG&E procedures and protocols, as well as the recommended monitoring for potential cultural resources as described in the Cultural Resources Assessment by e^2M (Attachment D). Therefore, the impacts would be less than significant.

2. **Less Than Significant Impact.** SDG&E is the primary electric utility provider in the region that maintains overhead electric distribution, power, and transmission lines. The project's impacts are generally limited to the ROW and do not contribute to the cumulative effects of other public and private development projects in the affected communities. Cumulative projects that would have substantially similar effects to the proposed project include other utility projects in the area. The SDG&E Orange Grove Pala Reconductor Project will be occurring in the same area and during the same timeframe as this proposed project. In addition, approximately 1,000 wood poles are programmed for replacement throughout the SDG&E service territory in 2009. These replacement projects would mainly occur in undeveloped or rural, fire-prone areas to provide greater system reliability and reduced future maintenance costs.

   Potential project effects are largely associated with short-term construction-related activities with regard to air quality, biological resources, cultural resources, noise, and traffic. Because these potential effects are transitory, primarily constrained to the existing SDG&E ROW, and would fully cease once construction is completed, they would not significantly add to any adverse long-term incremental impacts when considered in conjunction with the effects of past, present, or probable future projects. Impacts to air quality resulting from construction of proposed projects in the area would be minimized by implementation of BMPs and SDG&E's standard operational procedures and protocols. Implementation of SDG&E's NCCP would reduce the potential for cumulative impacts to biological resources resulting from the proposed project and other SDG&E projects. Potential impacts to cultural resources resulting from SDG&E projects would be minimized through implementation of monitoring as needed, and SDG&E standard protocols and procedures. Potential for noise and traffic impacts during construction of wood-to-steel projects would be minimized through implementation of appropriate minimization measures, notification of applicable local agencies, and SDG&E standard operational procedures and protocols.

   SDG&E is committed to complying with all applicable federal, state, and local regulations. Compliance with applicable provisions and implementation of standard operational procedures would minimize potential adverse effects relating to air quality, biological resources, cultural resources, noise, and traffic. Therefore, potential adverse effects would not be cumulatively considerable. Long-term project operation impacts associated with noise and aesthetics are not considered significant. The maintenance activities involve the removal of wood poles and installation of equivalent steel poles that

exist elsewhere in the project vicinity. As such, the proposed project would not contribute to a significant cumulative visual impact.

The project's incremental effects are not anticipated to contribute substantially to cumulatively considerable impacts. Cumulative projects include the past and proposed future wood-to-steel pole replacement projects within the vicinity of this alignment. More specifically, the cumulative study area includes the number of poles that are anticipated to be under construction concurrent to the construction on this tie line. The number of poles to be constructed in any month will vary based on several factors, including construction start dates, the number of contractors, and outage restrictions. This tie line is proposed to start construction in September 2009 and continue until December 2009. SDG&E expects potentially two to three tie lines to be constructed simultaneously during this time period.

The GHG emissions from the pole replacement project are well below significance thresholds thus far suggested (e.g. 10,000 metric tons/year for construction included in the south Coast Air Quality Management district suggested guidelines, December 2008; 7,000 metric tons/year by the CARB, October 2008). The emissions are also less than significant as compared to the system-wide reductions being pursued by SDG&E in accordance with its Long-Term Procurement Plan approved by the CPUC in September 2008. For these reasons, this project's contribution to global climate change is not cumulatively considerable and therefore the project's contribution to cumulative impacts would be less than significant.

The project's contribution to global climate change is expected to be less than significant and less than cumulatively considerable because (1) the project's impacts alone would not cause or significantly contribute to global climate change and (2) the net increase in air pollutant emissions due to the proposed project would not exceed the County thresholds for criteria pollutants.

For these reasons, there are no impacts that are individually limited but cumulatively considerable. Cumulative impacts that would potentially result from the proposed project would be less than significant.

3. **Less Than Significant Impact**. The proposed project would not have any substantial adverse impacts on human beings, either directly or indirectly. This is because the level of construction activity required by the proposed project would be minimal, thus resulting in only minor temporary and short-term impacts relative to air quality, noise, traffic, and other related issues. In addition, SDG&E standard operational procedures and protocols would be incorporated into the proposed project to further minimize potential impacts. The project would benefit human beings through increased system reliability and reduced susceptibility to fire and future maintenance costs. All short-term construction impacts to human beings are considered less than significant.

8.0 REFERENCES

California Department of Conservation; California Geological Survey, 2007. *Special Publication 42: Fault-Rupture Hazard Zones in California (Interim Revision).*

California Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program. 2006.

California Environmental Protection Agency. *List of "active" CDO and CAO from Water Board.* Online: http://www.calepa.ca.gov/sitecleanup/corteselist. Site accessed June 10, 2009.

County of San Diego. 1986. *San Diego County General Plan, Scenic Highway Element*.

County of San Diego. 2005. Department of Parks and Recreation. *Regional Trails and Pathways* (Map).

County of San Diego. 2007a. *Guidelines for Determining Significance, Air Quality*.

County of San Diego. 2007b. *Guidelines for Determining Significance and Report Format and Content Requirements, Visual Resources*.

County of San Diego. 2007c. *Guidelines for Determining Significance, Emergency Response Plans.*

County of San Diego. 2007d. *Guidelines for Determining Significance, Geologic Hazards*.

Department of Toxic Substances Control (DTSC). 2007. *EnviroStor* database search. Online: http://www.envirostor.dtsc.ca.gov/public. Site accessed June 10, 2009.

Department of Transportation. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm. Site visited June 8, 2009.

engineering-environmental Management, Inc (e^2M). June 2009. eTS #8261; TL 698 Wood to Steel Replacement Project (e2M #4330-104-01-03).

Federal Emergency Management Agency. 1997. *Flood Insurance Rate Map. San Diego County, California and Incorporated Areas*. Map Number 06073C0484F.

National Flood Hazard Layer Web Map Service (WMS)

Pangea. 2009. *Habitat Assessment for Arroyo Toad and Least Bell's Vireo, TL 698, Pala*. June 2, 2009.

Randall, Kesler. Paleontological Records Search – SDG&E TL 698 Reconductor and Wood to Steel Project. San Diego Natural History Museum. June 9, 2009.

Southern California Earthquake Data Center, Elsinore Fault Zone: Laguna Salada Fault. http://www.data.scec.org/fault_index/elsfault.html. Site accessed on June 11, 2009.

State Water Resources Control Board (SWRCB). 2008. *Geotracker* database search. Online: https://geotracker.waterboards.ca.gov. Site accessed June 10, 2009.

TRC. SDG&E NCCP Pre-Activity Survey Report for Orange Grove TL698 Reconductor Project. July 2009.

United States Department of Agriculture: Natural Resource Conservation Service, 2007. Web Soil Survey. Accessed online at http://websoilsurvey.nrcs.usda.gov/app/. Accessed on June 11, 2009.

U.S. Environmental Protection Agency (USEPA). 2008. *Superfund Information Systems* database search. Online: http://cfpub.epa.gov/supercpad/cursites/srchsites.cfm. Site accessed June 10, 2009.

SDG&E NCCP
Preactivity Study Form

Date	6/1/2009
Date Due	6/15/2009
eTS Number	8261
Project Name	TL698, Wood to Steel, Monserate-Pala
Address/Location	Monserate to Pala Substations
TB Coordinate(s)	Pages: 1047, 1048, 1028, and 1029.
Project Type	5.2 - Pole Replacement
DPSS	
Project Description	Tie Line 698 consists of the replacement of 75 wood transmission poles with equivalent light-duty, direct buried steel poles to improve system reliability in fire prone areas. The proposed project is located on private land in an unincorporated area of San Diego County between the communities of Fallbrook and Pala.
Type of Activity	Maintenance ☒ New Facility ☐
Client Lead	Alan Dusi
Client Lead Contact Info	Office: 858-636-5787 Email: ADusi@semprautilities.com
Contract Number	5660014173 - TRC
Internal Order Number	7011107
ES South Reviewer	Todd Easley
Field Reviewer	Company: TRC
Date of Field Survey	Various (last day: 6/02/2009)
Weather	See Table 2
Site Elevation	2000-3000 ft
Survey Start/End Times	See Table 2
Preserve	Inside Preserve ☐ Outside Preserve ☒
Narrow Endemics	Present or Likely ☐ Not Present nor Likely ☒
Additional Permitting	Yes ☐ No ☒
Comments	

Project Description

San Diego Gas & Electric (SDG&E) is proposing to remove 75 wood transmission poles on private land and replace them with equivalent light-duty, direct buried steel poles on Tie Line 698 (TL 698) to improve system reliability in fire prone areas. The proposed project is located within an unincorporated area of San Diego County, between the community of Fallbrook in the west and the community of Pala in the east (Thomas Bros. Pages 1047, 1048, 1028, 1029). The proposed project alignment occurs in portions of the Bonsall and Pala, California, United States Geological Survey (USGS) 7.5' topographic quadrangle maps. A separate PSR document covers the Orange Grove Reconductoring project on TL 698 (associated with the Orange Grove Peaker Plant) and addresses the reconductoring, site access, stringing sites, helicopter landing sites, and Orange Grove reconductoring pole replacement activities on TL 698. However, the table below does mention access to the pole site as part of the construction notes.

The poles that are being replaced, staging/laydown yards, and a helicopter landing site are listed below, including notes regarding construction, dimensions, and access as discussed in the field review with SDG&E. This pre-activity study analyzes the potential impacts associated with proposed actions at 75 pole sites and up to four proposed associated laydown areas. (Blue font indicates Wood to Steel Cable Pole; Red font indicates Wood to Steel Pole Replacement).

Table 1
List of Pole Replacement Sites, Laydown Areas and Helicopter Landing Site

Pole Number	Pole Count	Proposed Action(s)	Construction Notes
118766	1	Replace	Monserate Sub. Pole is inside substation lot. Access pole on existing paved roads and the Monserate Substation.
613000	1	Replace	Pole is outside substation at NE corner. Access from inside substation lot.
219359	1	Replace	Access via drive way on N side and overland across disturbed lot, possible mowing.
217088	1	Replace	Access pole overland on disturbed residential property from the N and S. Will use large crane from disturbed property below pole. Dig new pole site on W side of existing pole.
510158	1		Use same hole if possible. Access via residential drive and overland across residential lawn.
219361	1	Replace	Redtail Hawk nesting nearby in canyon. Access across disturbed lot, may require mowing.
219362	1	Replace	Horse pen in ROW may need to be moved temporarily. Re-establishing (grade) access along fence line would require grading.
219363	1	Replace	Pole in residential yard. Access pole and set-up in disturbed vacant lot on N side of residential yard fence.
219364	1	Replace	Remove property owner's fencing temporarily and drive overland across residential disturbed side yard. Possible trimming of ornamental vegetation.
219365	1	Replace	Access via residential paved and gravel drive. Remove motor home temporarily on adjacent disturbed lot. Use same hole if possible.
219366	1	Replace	Access via residential paved road and disturbed lot. Use same hole if possible.

Pole Number	Pole Count	Proposed Action(s)	Construction Notes
119273	1	Replace	Access via paved road and disturbed road shoulder. Use same hole if possible.
219367	1	Replace	Access via paved residential road/drive.
119272	1	Replace	Access via paved residential road/drive.
219368	1	Replace	Access via paved residential road/drive. Drainage to NE.
119271	1	Replace	Access via existing dirt road and pad at pole. Site adjacent to riparian corridor.
119270	1	Replace	Access via existing dirt road and disturbed lot adjacent to lemon grove. Stub pole to be changed as well, located directly across access path.
Un-numbered Pole	1		Stub pole to 119270 located 25 feet to the north on the other side of the road. Bare ground (on a dirt road at the side of a citrus orchard).
119269	1	Replace	Access via paved residential road/driveway on private property.
216887	1	Replace	Access via existing paved road and disturbed road shoulder. Potential staging yard site.
115858	1	Replace	Access via paved residential road/drive and disturbed lot, which may require mowing.
219369	1		Access via residential drive and existing spur road to pole. Potential outrigger (2' x 3') impacts to disturbed CSS x 4 outriggers.
219371	1	Replace	Access via paved residential road and dirt spur road. Existing distribution pole with anchors will not be removed or replaced.
219373	1	Replace	Access via residential drive and existing spur road to pole.
219374	1	Replace	Re-establish access road on edge of avocado grove by re-grading road and trimming/cutting back avocado trees.
219375	1	Replace	Re-establish access road on edge of avocado grove by re-grading road and trimming/cutting back avocado trees.
219376	1	Replace	Access via existing dirt road through avocado grove and disturbed lot.
219377	1	Replace	Access via paved road and disturbed road shoulder. Set-up on disturbed road shoulder.
219378	1	Replace	Access via paved road and disturbed road shoulder.
219379	1	Replace	Re-establish by grading existing old overgrown access road.
219380	1	Replace	Pole in residential backyard. Access via adjacent disturbed residential yard on S side of fence. Old pole to be removed. Trim ornamental vegetation. Use same hole if possible.
219381	1	Replace	Access via existing paved road.
219382	1	Replace	Access via paved road and road shoulder.

Pole Number	Pole Count	Proposed Action(s)	Construction Notes
219384	1	Replace	2 new anchor rods. Trim oak and cottonwood trees to south of site to allow access via berm along commercial koi pond.
219386	1	Replace	Pole site is in agricultural field. Access across agricultural field.
219389	1	Replace	Access via existing dirt road and disturbed area that will be mowed.
219390	1	Replace	Access via existing dirt road and disturbed area surrounding pole. Mow grass and weeds surrounding pole site.
219391	1	Replace	ROW blocked by property owner's agricultural lot with surrounding silt fence. Re-establish access to pole by grading road.
219392	1	Replace	One additional anchor to be added; not in line. Re-establish access road along agricultural field and disturbed area with some disturbed css.
219393	1	Replace	Access via existing dirt road. Pole site is bare ground but is surrounded by Coastal Sage Scrub (CSS) on slope; potential for outriggers to hit CSS habitat. Riparian area to N across access road.
511487	1	Replace	Access via paved residential road. Near oaks at edge of riparian area.
219394	1	Replace	Access via paved residential road. Near oaks at edge of riparian area and drainage.
219395	1	Replace	Access via paved residential road. Near willows at edge of riparian area and drainage.
219396	1	Replace	Access via residential road.
219397	1	Replace	Access via residential drive and avocado grove. May re-grade road and trim Avocado trees for access.
219398	1	Replace	Access via paved road and disturbed road shoulder.
219399	1	Replace	Access via disturbed lot/residential yard. Brush non-native trees.
219400	1	Replace	Re-establish (grade) access road. Remove abandoned Honda on access road. Cut back native shrub (sumac) near pole site.
219402	1	Replace	Access via residential drive and overland on residential ornamental/landscaped yard.
219403	1	Replace	Access via paved road and road shoulder adjacent to citrus orchard. May require trimming of orange tree.
219404	1	Replace	2 new anchors. Access via residential paved road. Foot traffic in residential yard/ornamental vegetation. Large crane set from cul-de-sac (Cerranos Court) above pole.
31508	1	Replace	Access via paved residential road and landscaped road shoulder. Pole is in ornamental vegetation. Possible trimming to oak tree.
219405	1	Replace	Stub pole and 4 anchors total will be replaced. Access via narrow paved golf cart track and landscaped area surrounding golf cart track. Trim ornamental pine trees.

Pole Number	Pole Count	Proposed Action(s)	Construction Notes
208026S	1	Replace	Stub pole to 219405. Landscaped slope next to residence by golf course.
612532	1	Replace	Replace 6 anchors. Set-up on other side of trees.
612533	1	Replace	Access via paved road adjacent to landscaped golf course.
219407	1	Replace	1 new anchor. Access via disturbed path next to golf course.
219408	1	Replace	Access via golf course; set-up on course to NW of pole site.
219412	1	Replace	Access via existing overgrown access road that will be mowed and/or graded. Use same hole if possible. Ostrich on property.
219413	1	Replace	1 new anchor to W of pole site. Access via existing overgrown access road that will be mowed and/or graded. May trim riparian vegetation on access road. Move pole approx. 3 feet north. Ostrich on property.
219414	1	Replace	2 golden eagles sited here. Access via existing overgrown road that will be mowed. Use bucket truck staged south of drainage on access road for pole installation. Cut at ground level and leave stump of old pole in place. Move pole approx. 5 feet north. Ostrich on property.
219415	1	Replace	4 new anchors. Use bucket truck staged south of drainage on access road for anchor installation. Avoid drainage to north of pole. Staging area to W. Access via existing overgrown road that will be mowed and/or graded. Ostrich on property.
219419	1	Replace	Trim avocado tree. Re-establish (grade) existing access road through avocado grove.
219421	1	Replace	2 new anchor rods. Trim orange tree. Re-establish (grade) existing access road through avocado/orange groves.
219422	1	Replace	Trim orange tree. Access via existing dirt access road.
219423	1	Replace	Trim orange tree. Access via existing dirt access road.
219424	1	Replace	Trim orange tree. Access via existing dirt access road.
110013	1	Replace	One new anchor. Access via Hwy 76 and road shoulder by fruit and vegetable stand.
110014	1	Replace	Access via Hwy 76 and road shoulder.
110015	1	Replace	Cultural monitoring. One new anchor. Access via Hwy 76 road shoulder.
P414366	1	Replace	Access via private lot of disturbed habitat.
110020	1	Replace	Access via paved residential road/drive and across residential lawn.
110021	1	Replace	Access via residential paved road/drive and existing dirt roads for old dairy.
110023	1	Replace	Access via old paved and dirt roads in old dairy.
118820	1	Replace	Existing Cable Riser Pole. Access via existing access road between Hwy 76 and Pala Substation.

Pole Number	Pole Count	Proposed Action(s)	Construction Notes
75			
Staging Yard Number/Name			
#1 Mission Road			Access from Hellers Rd., off of Mission Rd. Mowed, non-native grass/weeds; 1.6 acres
#2 Via Monserate			Access from Via Monserate; adjacent to Helicoptor Site. Gated disturbed habitat; 1.5 acres
#3 Old Highway 395			Access from Old Hwy 395 via turn-off onto gravel driveway; gated soil storage yard of mainly disturbed habitat and bare ground; 1.5 acres
#4 Avocado Grove			Near pole 219415; 0.5 acre
Helicoptor Site			Access from Via Monserate; adjacent to Laydown Yard. Gated disturbed habitat; 0.6 acre

Pole Replacement

The new steel poles will range in height from 65 to 90 feet, each approximately 30 inches in diameter (installation will result in approximately 5 square feet permanent impacts per pole), and will be directly-embedded approximately 9 to 12 feet deep. Crews will use an area (confined to the previously disturbed areas around the base of the existing poles to the greatest extent possible) within a 10-foot radius (309 square feet temporary impact; 314 square feet minus 5 square feet of permanent impact for steel pole placement) of each pole to provide a safe and adequate workspace. Crews will completely pull the old wood poles directly out of the ground via line truck. In some instances, the old wood poles will be cut at the base or cut 6-12 inches below the surface and left in place due to site conditions. The replacement poles will be located as close as possible to the existing poles, usually within 3 to 6 feet, in which installation of the new steel poles will require excavating the pole holes either using a truck-mounted auger or by hand with the aid of a hand jack powered by an air compressor. Excavated soil will be placed in a spoil pile adjacent to each hole. Plywood boards and plastic covering will be used to cover the excavated holes until pole installation activities begin. The new poles will be installed using a standard line truck, a special large crane, or by helicopter and the soil will be backfilled around the poles. Any excess spoil generated from project activities will be dispersed evenly on the existing access roads and properly compacted over areas in which drainage and vehicle accessibility will be maintained. The appropriate Best Management Practices (BMPs) will be used before, during, and after all project-related construction where necessary to prevent off-site sedimentation.

In addition, each steel pole would have two grounding rods. The grounding rods are approximately 8 feet in length and would be installed approximately 6 feet apart within the established temporary work area (10-foot radius). No permanent environmental impacts would be associated with the grounding wire installation.

Per SDG&E, it is assumed that existing anchors and/or a conduit will be transferred to the new steel pole. Where possible, the existing guy wire for the anchor would be detached from the existing pole and reattached to the new steel pole. In some instances, to comply with design standards, additional anchors may be required. Any supplemental modifications or additions to anchor locations required during construction would be evaluated by the biological and archaeological monitors prior to any work. Any such modifications would be accounted for in the post-construction monitoring report.

At sites where additional anchors have been identified, where possible, the new anchor installation will be located no more than 4 feet in front or behind an existing anchor, in similar habitat, and directly in line with the existing anchor and steel pole. A total of 10 pole sites occurring within this project have been identified as receiving new anchor installations, which will include the installation of 13 new anchors in total. The number of new anchors and their respective pole sites are as follows: there will

be 1 new anchor at site 219369; 2 new anchors at site 219384; 1 new anchor at site 219392;, 2 new anchors at site 219404; 1 new anchor at site 219407; 1 new anchor at site 219413; 4 new anchors at site 219415; 2 new anchors at site 219421; 1 new anchor at site 110013; 1 new anchor at site 110015.

The positioning of line and bucket trucks will involve the placement of four outriggers (per vehicle) with dimensions of approximately 2 feet wide by 3 feet long 96 square feet) per outrigger. The staging of cranes will involve the placement of four outriggers (per crane) with dimensions of approximately 4 feet wide by 4 feet long (16 square feet) per outrigger. However, the precise placement of each outrigger cannot be determined until construction occurs. Impacts may occur to a variety of vegetation types; therefore, outrigger placement impacts are not included in this report. Biological monitors will provide guidance to ensure impacts are minimized during outrigger placement. The actual impacts will be assessed during construction monitoring and will be included in the post-construction biological report.

Pole Removal

Pole removal activities will utilize bucket trucks to remove cross arms and wires. Each pole will be sectioned into pieces and lowered to the work pad. All old poles, associated hardware, and any other debris generated from project activities will be removed from the project and disposed of properly. In addition, existing pole stumps from past pole replacements may be removed, or replaced with the steel pole in the same hole when possible, or cut at or below ground level and left in place as necessary to avoid potential impacts to resources.

Personnel, Equipment, and Duration

Construction of the project will require multiple, four- to six-person crews, including a road grader, standard line trucks, a truck-mounted auger, pulling machines, bucket trucks, crew trucks, mobile fuel trucks, hydraulic rock drilling and splitting equipment, and a helicopter. Project activities will take approximately four to six months to complete.

Habitat Evaluation

The project sites are located on flat land and gentle to steep slopes in developed (suburban residential and rural residential), planted groves, and natural areas and consist of coastal sage scrub, chaparral, coast live oak woodland, non-native grassland, disturbed habitat, ornamental, agricultural, and bare ground as described below. Several unnamed drainages or features, potentially subject to Army Corps of Engineers (ACOE), California Department of Fish and Game (CDFG), and Regional Water Quality Control Board (RWQCB) jurisdiction, are located throughout the project area. However, because these features are located far enough away from where ground disturbance is proposed and because all appropriate Best Management Practices (BMPs) will be implemented to prevent off-site sedimentation, no potentially jurisdictional areas (waters or wetlands) are anticipated to be affected as a result of project-related activities. The following table outlines survey dates, times, and their corresponding weather conditions:

Table 2
Field Survey Conditions

Date	Time	Temp (Fahrenheit)	Wind (mph)	Sky	TRC Staff	Field Visit Purpose
05/27/2009	0700-1600	60°-72°	0-5	Overcast	DB, PP	Fielding
05/29/2009	0700-1300	60°-72°	0-5	Overcast	DP, PP	Fielding
06/01/2009	0700-1600	65°-78°	0-5	Overcast/clear	DB, LG	PSR Survey
06/02/2009	0700-1700	65°-75°	0-5	Overcast/clear	DB, LG	PSR Survey

TRC Staff: DB=Darren Burton; PP=Paula Potenza; LG=Lisa Gadsby

Project sites within and/or surrounded by chaparral vegetation are primarily dominated by various combinations of chamise (*Adenostoma fasciculatum*), scrub oak (*Quercus berberidifolia*), laurel sumac (*Malosma laurina*), bigberry manzanita (*Arctostaphylos glauca*), and mission manzanita (*Xylococcus bicolor*), less so by chaparral whitethorn (*Ceanothus leucodermus*), mountain mahogany (*Cercocarpus betuloides*), southern honeysuckle (*Lonicera subspicata*), sugarbush (*Rhus ovata*), and to a lesser extent by white sage (*Salvia apiana*), California buckwheat (*Eriogonum fasciculatum*), chaparral candle (*Hersperoyucca whipplei*), deerweed (*Lotus scoparius*), interior goldenbush (*Ericameria liearifolia*), poison oak (*Toxicodendron diversilobum*), and rarely coast live oak (*Quercus agrifolia*).

Project sites within and/or surrounded by coastal sage scrub (CSS) vegetation are primarily dominated by various combinations of California sagebrush (*Artemisia californica*), California buckwheat, saw-toothed goldenbush (*Hazardia squarrosa*), black sage (*Salvia mellifera*), and white sage (*Salvia apiana*), and to a lesser extent by deerweed, wild cucumber (*Marah macrocarpus*), needlegrass species (*Nassella* spp.), and California aster (*Corethrogyne filaginifolia*).

Project sites within and/or surrounded by coast live oak woodland vegetation are primarily dominated by various combinations of coast live oak, Mexican elderberry (*Sambucus mexicana*), poison oak, scrub oak, and California buckwheat, and often have an understory mixture of native bunchgrass species and non-native grasses (*Bromus* spp., *Avena* spp.) and forbs.

Project sites within and/or surrounded by disturbed habitat are primarily dominated by various combinations of shortpod mustard (*Hirshfeldia incana*), red brome (*Bromus madritensis*), Russian thistle (*Salsola tragus*), wild oat (*Avena* spp.), tocalote (*Centaurea melitensis*), filaree species (*Erodium* spp.), foxtail barley (*Hordeum murinum*), lamb's quarters (*Chenopodium album*), horseweed (*Conyza canadensis*), soft chess (*Bromus hordeaceus*), and crabgrass (*Digitaria sanguinalis*).

Project sites within and/or surrounded by grassland are dominated by various combinations of non-native grasses and forbs and occasional native grasses (*Nassella* spp.).

Project sites within and/or surrounded by landscaped/ornamental vegetation are usually dominated by exotic, non-native species common to horticultural landscaping in Southern California. Typical ornamental vegetation within the project site include juniper shrubs and trees, oleander shrubs, liquidambar trees, wattle shrubs and trees, eucalyptus trees, and ground covering plants of various horticultural varieties.

Project sites within and/or surrounded by agricultural vegetation are primarily dominated by citrus trees, avocado trees, and occasional herbaceous fruit and vegetable fields (e.g., tomatoes).

Project sites within and/or surrounded by bare ground include areas of exposed soil, rock, unpaved access roads, as well as developed areas such as blacktop, pavement, sidewalks, and other concreted structures.

The following Replacement Pole Site is immediately within and surrounded by coastal sage scrub vegetation: 219407.

The following Replacement Pole Site and is immediately within and surrounded by a combination of chaparral vegetation and disturbed habitat: 219390.

The following Replacement Pole Site is immediately within and surrounded by a combination coastal sage scrub vegetation, grassland, and bare ground: 219426

The following Replacement Pole Site is immediately within and surrounded by coast live oak woodland and disturbed habitat: 219368.

The following Replacement Pole Site is immediately within and surrounded by grassland: 219379.

The following Replacement Pole Sites are immediately within and surrounded by landscaped/ornamental: 219364, 219365, 119269, 219381, 219402, 219404, 31508, 219405, 612532, 612533, and 219408.

The following Replacement Pole Sites are immediately within and surrounded by disturbed habitat: 219361, 219362, 219371, 219378, 219392, 511487, and 219400.

The following Replacement Pole Sites are immediately within and surrounded by agriculture: 219397 and 610860.

The following Replacement Pole Sites are immediately within and surrounded by bare ground: 118766, 119273, 219367, 119270, 216887, 115858, 219374, 219382, 219384, 219393, 219394, 219395, 219396, 219399, 219412, 219413, 219414, 219424, P11008, 414512, 110011, 110013, 110014, 110015, 110021, and 119272.

The following Replacement Pole Sites are immediately within and surrounded by various combinations of grassland and bare ground: 219359, 219427, 219428, and 219429.

The following Replacement Pole Sites are immediately within and surrounded by various combinations of agriculture, landscaped/ornamental, disturbed habitat, and bare ground: 119271, 217088, 219363, 219372, 219373, 219375, 219376, 219377, 219391, 219398, 219403, 219419, 219422, 219423, and 613000.

The following Laydown Area is immediately within and surrounded by coastal sage scrub: Laydown Area #4.

The following Laydown Area is immediately within and surrounded by grassland: Laydown Area #5.

The following Laydown Areas are immediately within and surrounded by disturbed habitat: Laydown Area #1, Laydown Area #2, and Laydown Area #3.

Wildlife

Wildlife or wildlife sign observed during the survey included harvester ant (*Pogonomyrmex californicus*), pacific tree frog (*Pseudachris regilla*), orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), western fence lizard (*Sceloporus occidentalis*), western side-blotched lizard (*Uta stansburiana*), acorn woodpecker (*Melanerpes formicivorus*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), bushtit (*Psaltriparus minimus*), California quail (*Callipepla californica*), California towhee (*Pipilo crissalis*), Cedar waxwing (*Bombycilla cedrorum*), common raven (*Corvus corax*), gadwell (*Anas strepera*), golden eagle (*Aquila chrysaetos*), greater roadrunner (*Geococcyx californianus),* house finch (*Carpodacus mexicanus*), lesser goldfinch (*Carduelis psaltria*), mourning dove (*Zenaida macroura*), northern flicker (*Colaptes auratus*), Nuttall's woodpecker (*Picoides nuttallii*), oak titmouse (*Baeolophus inornatus*), Oregon junco (*Junco hyemalis*), red-shouldered hawk (*Buteo albonotatus*), red-tailed hawk (*Buteo jamaicensis*), song sparrow (*Melospiza melodia*), spotted towhee (*Pipilo maculatus*), turkey vulture (*Cathartes aura meridionalis*), western kingbird

(*Tyrannus verticalis*), western scrub-jay (*Aphelocoma californica*), wrentit (*Chamaea fasciata*), California ground squirrel (*Spermophilus beecheyi*), cottontail (*Sylvalagus audubonii*), coyote (*Canis latrans*), and mule deer (*Odocoileus hemionus*).

According to the Sensitive Species Geographic Information System (GIS) maps provided by SDG&E and the California Department of Fish and Game's California Natural Diversity Database (CNDDB), the following species covered by SDG&E's Subregional Natural Communities Conservation Plan (NCCP) have been documented within the vicinity of the project site, and have the potential to occur within the project area: arroyo toad (*Bufo californicus*), coast (San Diego) horned lizard (*Phrynosoma coronatum blainvillii*), Coronado skink (Plestiodon skiltonianus interparietalis), northern red-diamond rattlesnake (*Crotalus ruber*), orange-throated whiptail (*Aspidoscelis hyperythra*), coastal California gnatcatcher (*Polioptila californica*), coastal cactus wren (*Campylorhynchus brunneicapillus*), golden eagle, least Bell's vireo (*Vireo bellii pusillus*), least bittern (*Ixobrychus* exilis), tricolored blackbird (*Agelaius tricolor*), southern rufous-crowned sparrows (*Aimophila ruficeps* spp. *canescens*), southwestern willow flycatcher (*Empidonax traillii extimus*), yellow-breasted chat (*Icteria virens*), yellow warbler (*Dendroica petechia*), white-faced ibis (*Plegadis chihi*), and San Diego desert woodrat (*Neotoma lepida intermedia*).

The project area contains habitat with the potential to support several of the above listed species. Riparian areas that have the potential to support arroyo toad, large-blotched salamander, southwestern pond turtle, least Bell's vireo, and tricolored blackbird are absent along the alignment. Upland foraging habitat suitable for the potential to support arroyo toad is similarly absent within the project site. California mountain king snake, coast horned lizard, and orange-throated whiptail have the potential to occur within the chaparral, coastal sage scrub, and rocky, disturbed areas that occur along the alignment. Additionally, orange-throated whiptail and coast horned lizard have the potential to occur within the oak woodland habitats along the alignment. During the surveys, no coast horned lizard species or their sign were observed, however harvester ants, which are the primary food source of coast horned lizards, were observed in various locations throughout the project area. Orange-throated whiptail lizards were sighted at various locations along the alignment. Covered species that may occur in the vicinity of the poles scheduled for replacement are mobile and, if present, should leave or avoid the site during disturbances. Since all operational protocols and reviewer recommendations will be implemented, no impacts to these species are anticipated as a result of project-related activities.

The project area contains habitat with the potential to support the southern rufous-crowned sparrow, an NCCP-listed species. Southern rufous-crowned sparrows are found in open coastal sage scrub and chaparral on medium to steep slopes, often in post-burn vegetation. Because southern rufous-crowned sparrows are highly capable of dispersing and all operational protocols and reviewer recommendations will be implemented, no impacts to this species are anticipated as a result of project-related activities.

No other covered wildlife species, burrows, dens, nests, or nesting activities were observed within the project site during the survey.

Botany

Sensitive plant species identified from the GIS maps and CNDDB that have the potential to occur within the project area include dwarf burr ambrosia (*Ambrosia pumila*), chaparral nolina (*Nolina interrata*), felt-leaved monardella (*Monardella hypoleuca* ssp. *lanata*), mesa horkelia (*Horkelia cuneata* ssp. *puberla*),Parry's tetracoccus (*Tetracoccus parryi*), Payson's jewel-flower (*Caulanthus simulans*), and Robinson's pepper-grass (*Lepidium virginicum* var. *robinsii*). Botanical surveys were performed on 6/1/2009 and 6/2/2009. None of those species were observed during the surveys.

Direct impacts to sensitive plant and wildlife species are not anticipated as a result of project-related activities.

Reviewer Recommendations

The following is a list of general recommendations for all pole sites and specific recommendations for key pole sites that should be implemented to minimize impacts to resources due to project-related activities:

1. A biological monitor shall be present during all project-related activities at each site to assist crews in minimizing impacts to biological resources.

   Crews shall implement appropriate BMPs in accordance with the Storm Water Pollution Prevention plan (SWPPP) and with the guidance from the SWPPP monitor.

2. All project related activities must comply with the Migratory Bird Treaty Act (MBTA). Active nests (i.e. nests with eggs or chicks) are protected year-round by MBTA. Project related activities that will require disturbance, removal of an active nest, or that causes a breeding bird to leave the nest for prolonged lengths of time are not permitted. Trimming or removal of vegetation during the peak-breeding season (February - August) requires a pre-activity survey by a qualified wildlife biologist to confirm that active nests will not be affected by work activities. If active nests are identified, the biological monitor shall inform the crews and call Todd Easley @ (858) 735-7152 prior to proceeding with project activities in the area of the active nest.

3. If crews find any active nest within the work site they shall not disturb or impact the nest. A biological monitor shall be notified of the active nest and verify the location and if it is active. If the nest is active, the monitor will notify SDG&E prior to any additional project activity within the area of the active nest.

4. All vehicles and equipment shall remain within designated off-site laydown areas, helicopter landing sites, as well as existing dirt, paved access roads (including parking lots), and previously disturbed areas for the duration of the project. No new access roads or spur roads shall be established as a result of this project. Access to some site will require overland travel or travel on mowed vegetation. These areas shall be cleared by the biological monitor prior to any work at these locations/sites.

5. All drainages will be avoided and flagged for avoidance by a qualified biologist. If re-grading is necessary on existing access roads, crews will lift the blade 25 feet before and after the flagged drainage crossing. BMPs shall be placed appropriately as mentioned above (item 3). Access roads to poles that have drainages that will be flagged for avoidance prior to any work performed are located near or adjacent to the following sites: 119271, 219213, 219214, 219215, and 219368.

6. All staging areas, laydown areas, and helicopter landing pads will be located on disturbed ground with appropriate BMPs in place. A biological monitor will clear the areas before they are used.

7. A post-construction biological survey shall be performed of all proposed work areas to document any deviations from this plan. Deviations may include refining access to poles.

8. Work crews should keep temporary work areas within previously disturbed areas at the base of the pole and not exceed larger than the 314 square foot temporary work area around each single pole structure.

9. All materials and project-related debris (including flagging placed by biologists) shall be removed from the project site and properly disposed of at an appropriate offsite location.

10. To minimize impacts to other sensitive wildlife species (i.e. reptiles) that may occur along dirt access roads, workers should limit vehicle speeds to less than 15 miles per hour.

Summary of Impacts

Up to a total of approximately 270,706.25 square feet of temporary impacts and 375 square feet of permanent impacts are anticipated to occur as a result of activities involving pole replacement and associated laydown yards. Of these, a total of 270,242.75 square feet of temporary impacts and 367.5 square feet of permanent impacts will be to ruderal habitats (which includes disturbed habitat, bare ground, landscaped/ornamental, non-native grasslands, and agricultural lands) and a total of 463.5 square feet of temporary impacts and 7.5 square feet of permanent impacts will be to native habitats, including coastal sage scrub, chaparral, and coast live oak woodland (Table 3).

Table 3
Impacts by Habitat (Square feet)

Habitat Type	Sum of Permanent Impacts	Sum of Temporary Impacts
Agricultural	30	1699.5
Bare ground	177.5	10,768.25
Disturbed habitat	80	252,664
Landscape/ornamental	73.75	4,724.25
Non-native grassland	6.25	386.75
Total Ruderal Habitats	***367.5***	***270,242.75***
Chaparral	1.25	77.25
Coast live oak woodland	1.25	77.25
Coastal sage scrub	5	309
Total Native Habitats	***7.5***	***463.5***
Total All Habitats	**375**	**270,706.25**

The area of permanent impacts resulting from the installation of the directly-embedded steel poles was calculated assuming each pole averages 30 inches in diameter (approximately 5 square feet of permanent impact). The area of temporary impacts associated with pole installation activities were calculated assuming a 10-foot radius (309 square feet of temporary impact; 314 square feet minus 5 square feet of permanent impact) around the pole for a workspace. Impacts are caused by installing the proposed poles and consist of excavation of the new pole holes, placement of the excavated soil, and impacts caused by crew members accessing and walking on the areas around the poles.

No impacts are anticipated to result from anchor transfer activities (the transfer of the existing or new guy wire to an existing anchor rod in the ground), since no excavation would be required at those sites where existing anchor rods will be reused. Sites requiring additional, new, or replacement anchors (excavation and installation of a new anchor into the ground) were observed to posses similar or identical habitats as the poles and were determined to be in ruderal habitats (e.g., bare ground) that do not require mitigation. Impacts within each workspace were designated by dividing the area into quarters based on compass directions and identifying the dominant habitat type in each quarter.

Temporary impacts resulting from the removal of existing wood poles (at sites where pole replacement will not occur adjacent to the existing pole, but elsewhere) was calculated assuming a 6-foot-wide by 6-foot-long area (36 square feet temporary impact) for a workspace. No permanent impacts are anticipated to result from pole removal activities.

Additional temporary impacts will occur as a result of trenching at the Pala Substation. A trench will be dug extending from pole site 613001 to the substation to accommodate undergrounding of distribution 12 kV circuit. The trench will be approximately 400 feet long, 4 feet deep and 3 feet wide and will extend along the existing gravel access road off of Highway 76 leading to the Pala Substation, across approximately 30 feet of slope partially covered in coastal sage scrub vegetation, and ending at a manhole outside of the substation entrance surrounded by bare ground. Construction will be performed via a backhoe, loader, and hand-digging. Total temporary surface impacts of 400 feet long by 3 feet wide are 1200 square feet. Temporary impacts as a result of trenching will occur to 1,110 feet of bare ground at a mitigation ratio of 0:1. Temporary impacts to the thirty feet of trenching through coastal sage scrub shall be mitigated at a ratio of 1:1, totaling 90 square feet. The trenching is part of the Wood-to-Steel replacement project while pole 613001 will be replaced as part of a different project.

Mitigation

Work crews should follow the operational protocols, as stated in SDG&E's NCCP (Section 7.1 Operational Protocols) to avoid, minimize, or mitigate impacts to resources as a result of project-related activities at the project sites. Additional avoidance and minimization measures will be implemented through the Reviewer Recommendations listed above. Additionally, roughly half of the poles on this alignment stand within the East County Preserve and are labeled as such in Table 5, below. Mitigation ratios are set accordingly.

SDG&E proposes to mitigate for 7.5 square feet of permanent impacts to native vegetation habitats at a ratio of 2:1 (equal to a total of 15 square feet), and 463.5 square feet of temporary impacts at a ratio of 1:1 to native habitats as a result of project-related activities that include pole replacement and staging yard usages, for a total of 478.5 square feet. Additional temporary impacts to coastal sage scrub will occur from trenching at the Pala Substation in the amount of 90 square feet, for a grand total of 553.5 square feet of temporary impacts to native habitats as a result of all activities related to this project. The mitigation ratio for impacts to all ruderal habitats is 0:1. SDG&E proposes to drawdown 568.5 square feet of credit from the mitigation bank to mitigate for all impacts, both permanent and temporary, to native habitats as a result of project-related activities.

Impacts associated with maintenance of existing facilities are mitigated for the term of the permit by SDG&E's agreement to restrict development other than SDG&E's activities on fee-owned rights-of-way which contain habitat, connect fragmented habitat areas, or contribute to the habitat carrying capacities of the Preserve Areas in the region. SDG&E agrees to limit its use of such rights-of-way to utility activities. Therefore, mitigation for maintenance of existing facilities located outside of Preserve areas is not required.

References

SDG&E. 1995. Subregional Natural Community Conservation Plan. December 15, 1995.

California Department of Fish and Game (CDFG). 2009. California Natural Diversity Database. Available at http://www.dfg.ca.gov/biogeodata/cnddb/. Updated on January 1 2009.

U.S. Department of the Interior, United States Fish and Wildlife Service (USFWS). 2006. Biological Evaluation/Assessment San Diego Gas and Electric Permits. Cleveland National Forest. February.

Table 4
Land Use/Habitat Table

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 118766	North	developed	33.32910	-117.23503
	East	developed		
	South	developed		
	West	developed		
Replacement Pole 613000	North	landscape/ornamental	33.32930	-117.23506
	East	landscape/ornamental		
	South	bare ground		
	West	landscape/ornamental		
Replacement Pole 219359	North	non-native grassland	33.329081	-117.233322
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 217088	North	bare ground	33.32932	-117.23255
	East	disturbed habitat		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 510158	North	disturbed habitat	33.328936	-117.232019
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219361	North	disturbed habitat	33.32935	-117.22905
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219362	North	disturbed habitat	33.32941	-117.22772
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219363	North	landscape/ornamental	33.32936	-117.22680
	East	agricultural		
	South	agricultural		
	West	agricultural		
Replacement Pole 219364	North	agricultural	33.32936	-117.22569
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 219365	North	landscape/ornamental	33.32939	-117.22415
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 219366	North	bare ground	33.32943	-117.22230
	East	bare ground		
	South	landscape/ornamental		
	West	bare ground		
Replacement Pole 119273	North	bare ground	33.32939	-117.22152
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219367	North	bare ground	33.32941	-117.22051
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 119272	North	developed	33.32941	-117.21958
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219368	North	coast live oak woodland	33.32939	-117.21836
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 119271	North	disturbed habitat	33.32942	-117.21707
	East	landscape/ornamental		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 119270	North	bare ground	33.32943	-117.21568
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole Un-numbered stub pole across from 119270	North	bare ground	33.32951	-117.21565
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 119269	North	landscape/ornamental	33.32957	-117.21506
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 216887	North	bare ground	33.32945	-117.21442
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 115858	North	bare ground	33.32944	-117.21270
	East	bare ground		
	South	bare ground		
	West	bare ground		

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 219369	North	landscape/ornamental	33.329314	-117.211308
	East	disturbed coastal sage scrub		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219371	North	disturbed habitat	33.32955	-117.20825
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219373	North	landscape/ornamental	33.32948	-117.20492
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219374	North	bare ground	33.32945	-117.20250
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219375	North	agricultural	33.32945	-117.20145
	East	bare ground		
	South	agricultural		
	West	bare ground		
Replacement Pole 219376	North	bare ground	33.32940	-117.19959
	East	agricultural		
	South	agricultural		
	West	agricultural		
Replacement Pole 219377	North	developed	33.32938	-117.19744
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219378	North	disturbed habitat	33.32933	-117.19546
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219379	North	non-native grassland	33.32933	-117.19475
	East	non-native grassland		
	South	non-native grassland		
	West	non-native grassland		
Replacement Pole 219380	North	non-native grassland	33.328503	-117.193319
	East	non-native grassland		
	South	non-native grassland		
	West	non-native grassland		
Replacement Pole 219381	North	landscape/ornamental	33.32997	-117.19197
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 219382	North	bare ground	33.33032	-117.19110
	East	bare ground		
	South	bare ground		
	West	paved road		
Replacement Pole 219384	North	bare ground	33.3307937	-117.1898589
	East	bare ground		
	South	bare ground		
	West	paved road		
Replacement Pole 219386	North	agricultural	33.33197	-117.18695
	East	agricultural		
	South	agricultural		
	West	agricultural		
Replacement Pole 219389	North	bare ground	33.33410	-117.18221
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219390	North	chaparral	33.33488	-117.18098
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219391	North	agricultural	33.33556	-117.17992
	East	bare ground		
	South	bare ground		
	West	agricultural		
Replacement Pole 219392	North	bare ground	33.33555923	-117.179919
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219393	North	bare ground	33.33694	-117.17782
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 511487	North	disturbed habitat	33.33727	-117.17714
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219394	North	bare ground	33.33779	-117.17647
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219395	North	bare ground	33.33844	-117.17532
	East	bare ground		
	South	bare ground		
	West	bare ground		

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 219396	North	bare ground	33.33906	-117.17443
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219397	North	agricultural	33.33970	-117.17307
	East	agricultural		
	South	agricultural		
	West	agricultural		
Replacement Pole 219398	North	bare ground	33.34015	-117.17268
	East	landscape/ornamental		
	South	bare ground		
	West	bare ground		
Replacement Pole 219399	North	bare ground	33.34075	-117.17173
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219400	North	disturbed habitat	33.34148	-117.17056
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219402	North	landscape/ornamental	33.34269	-117.16870
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 219403	North	developed	33.34323	-117.16782
	East	bare ground		
	South	landscape/ornamental		
	West	bare ground		
Replacement Pole 219404	North	landscape/ornamental	33.34405	-117.16630
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 31508	North	landscape/ornamental	33.34470	-117.16558
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 219405	North	landscape/ornamental	33.34479	-117.16544
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 208026S (stub pole)	North	bare ground	33.34494	-117.16529
	East	bare ground		
	South	bare ground		
	West	bare ground		

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 612532	North	landscape/ornamental	33.34512	-117.16539
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 612533	North	landscape/ornamental	33.34543	-117.16434
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 219407	North	coastal sage scrub	33.34556	-117.16286
	East	coastal sage scrub		
	South	coastal sage scrub		
	West	coastal sage scrub		
Replacement Pole 219408	North	landscape/ornamental	33.34602	-117.16126
	East	landscape/ornamental		
	South	landscape/ornamental		
	West	landscape/ornamental		
Replacement Pole 219412	North	bare ground	33.34789	-117.15660
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219413	North	bare ground	33.34849	-117.15555
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219414	North	bare ground	33.34915	-117.15430
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219415	North	disturbed habitat	33.34979	-117.15311
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 219419	North	agricultural	33.34911	-117.14840
	East	agricultural		
	South	bare ground		
	West	agricultural		
Replacement Pole 219421	North	bare ground	33.346628	-117.14425
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 219422	North	bare ground	33.34833	-117.14472
	East	bare ground		
	South	agricultural		
	West	bare ground		

Pole Number or Site Description	Habitat Type		Latitude	Longitude
Replacement Pole 219423	North	bare ground	33.34763	-117.14326
	East	bare ground		
	South	bare ground		
	West	agricultural		
Replacement Pole 219424	North	bare ground	33.34725	-117.14242
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 110013	North	bare ground	33.34375	-117.12864
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 110014	North	bare ground	33.34389	-117.12767
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 110015	North	bare ground	33.34398	-117.12672
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole P414366	North	disturbed habitat	33.34562	-117.12234
	West	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 110020	North	disturbed habitat	33.348253	-117.117725
	West	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		
Replacement Pole 110021	North	bare ground	33.34852	-117.11726
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 110023	North	bare ground	33.348253	-117.117708
	East	bare ground		
	South	bare ground		
	West	bare ground		
Replacement Pole 118820	East	bare ground	33.354564	-117.113164
	South	bare ground		
	West	bare ground		
	East	bare ground		
Staging Yard #1 Mission Road	North	disturbed habitat	33.32404	-117.16039
	East	disturbed habitat		
	South	disturbed habitat		
	West	disturbed habitat		

Pole Number or Site Description	Habitat Type	Latitude	Longitude
Staging Yard #2 Via Monserate	North disturbed habitat	33.31746	-117.21851
	East disturbed habitat		
	South disturbed habitat		
	West disturbed habitat		
Staging Yard #3 Old Hwy 395	East disturbed habitat	33.31414	-117.23115
	South disturbed habitat		
	West disturbed habitat		
	East disturbed habitat		
Staging Yard #4 Avocado Grove	South disturbed habitat	33.349575	-117.152208
	West disturbed habitat		
	East disturbed habitat		
	South disturbed habitat		
Helicoptor Site Via Monserate	South disturbed habitat	33.31753	-117.22079
	West disturbed habitat		
	East disturbed habitat		
	South disturbed habitat		

Table 5
Impacts and Mitigation

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
118766	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
613000	No	O&M	landscape/ornamental	3.75	0 : 1	0	231.75	0	None Req
			bare ground	1.25	0 : 1	0	77.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219359	No	O&M	non-native grassland	1.25	2 : 1	0	77.75	0	None Req
			bare ground	3.75	0 : 1	0	231.75	0	
					: 1	0		0	
					: 1	0		0	
217088	No	O&M	bare ground	1.25	0 : 1	0	77.25	0	None Req
			disturbed habitat	1.25	0 : 1	0	77.25	0	None Req
			landscape/ornamental	2.5	0 : 1	0	154.5	0	None Req
					: 1	0		0	
510158	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					0 : 1	0		0	
					0 : 1	0		0	
					: 1	0		0	
219361	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
					: 1	0		0	None Req
					: 1	0		0	
					: 1	0		0	
219362	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219363	No	O&M	landscape/ornamental	1.25	0 : 1	0	231.75	0	None Req
			agricultural	3.75	0 : 1	0	77.25	0	None Req
					: 1	0		0	
					: 1	0		0	
219364	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
					: 1	0		0	
219365	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219366	No	O&M	bare ground	3.75	0 : 1	0	231.75	0	None Req
			landscape/ornamental	1.25	0 : 1	0	77.25	0	None Req
					: 1	0		0	
					: 1	0		0	
119273	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219367	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
119272	No	O&M	bare ground	1.25	0 : 1	0	77.25	0	None Req
			bare ground	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219368	No	O&M	coast live oak woodland	1.25	2 : 1	2.5	77.25	77.25	None Req
			disturbed habitat	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
119271	No	O&M	disturbed habitat	3.75	0 : 1	0	231.75	0	None Req
			landscape/ornamental	1.25	0 : 1	0	77.25	0	None Req
					: 1	0		0	
					: 1	0		0	
119270	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
Unnamed stub Pole near 119270	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
119269	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
					: 1	0		0	
					: 1	0		0	
216887	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
115858	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219369	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219371	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219373	No	O&M	landscape/ornamental	1.25	0 : 1	0	77.25	0	None Req
			disturbed habitat	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219374	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219375	No	O&M	agricultural	2.5	0 : 1	0	154.5	0	None Req
			bare ground	2.5	0 : 1	0	154.5	0	None Req
					: 1	0		0	
					: 1	0		0	
219376	No	O&M	bare ground	1.25	0 : 1	0	77.25	0	None Req
			agricultural	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219377	No	O&M	bare ground	1.25	0 : 1	0	77.25	0	None Req
			disturbed habitat	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219378	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219379	No	O&M	non-native grassland	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219380	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219381	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219382	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219384	No	O&M	disturbed habitat	5	0 : 1	0	309	0	
			disturbed habitat		: 1	0	12	0	
					: 1	0		0	
					: 1	0		0	
219386	No	O&M	agricultural	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219389	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219390	No	O&M	chaparral	1.25	2 : 1	2.5	77.25	77.25	None Req
			disturbed habitat	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219391	No	O&M	agricultural	1.25	0 : 1	0	77.25	0	None Req
			bare ground	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
219392	No	O&M	bare ground	5	0 : 1	0	309	0	
			bare ground		: 1	0	6	0	
					: 1	0		0	
					: 1	0		0	
219393	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
511487	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219394	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219395	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219396	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219397	No	O&M	agricultural	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219398	No	O&M	bare ground	3.75	0 : 1	0	231.75	0	None Req
			landscape/ornamental	1.25	0 : 1	0	77.25	0	None Req
					: 1	0		0	
					: 1	0		0	
219399	No	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219400	No	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
					: 1	0		0	
219402	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219403	No	O&M	bare ground	3.25	0 : 1	0	231.75	0	None Req
			landscape/ornamental	1.25	0 : 1	0	77.25	0	None Req
					0 : 1	0		0	None Req
					: 1	0		0	
219404	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
			landscape/ornamental		: 1	0	12	0	
					: 1	0		0	
					: 1	0		0	
31508	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219405	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
208026S	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
612532	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
612533	No	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219407	No	O&M	coastal sage scrub	5	2 : 1	10	309	309	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219408	Yes	O&M	landscape/ornamental	5	0 : 1	0	309	0	None Req
					: 1	0		0	

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
					: 1	0		0	
					: 1	0		0	
219412	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219413	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	None Req
					: 1	0		0	
					: 1	0		0	
219414	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
219415	Yes	O&M	disturbed habitat	5	0 : 1	0	309	0	None Req
			disturbed habitat		: 1	0	24	0	
					: 1	0		0	
					: 1	0		0	
219419	Yes	O&M	agricultural	3.75	0 : 1	0	231.75	0	None Req
			bare ground	1.25	0 : 1	0	77.25	0	
					: 1	0		0	
					: 1	0		0	
219421	Yes	O&M	bare ground	5	0 : 1	0	309	0	
			bare ground		: 1	0	12	0	
					: 1	0		0	
					: 1	0		0	
219422	Yes	O&M	agricultural	1.25	0 : 1	0	77.25	0	None Req
			bare ground	3.75	0 : 1	0		0	None Req
					: 1	0		0	
					: 1	0		0	
219423	Yes	O&M	bare ground	1.25	0 : 1	0	77.25	0	None Req
			agricultural	3.75	0 : 1	0	231.75	0	None Req
					: 1	0		0	
					: 1	0		0	
219424	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
110013	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
			bare ground		: 1	0	6	0	
					: 1	0		0	
					: 1	0		0	
110014	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
110015	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
			bare ground		: 1	0	6	0	
					: 1	0		0	
					: 1	0		0	
P414366	Yes	O&M	disturbed habitat	5	0 : 1	0	5	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
110020	Yes	O&M	disturbed habitat	5	0 : 1	0	5	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
110021	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
110023	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
118820	Yes	O&M	bare ground	5	0 : 1	0	309	0	None Req
					: 1	0		0	
					: 1	0		0	
					: 1	0		0	
Staging Area #1	No	O&M	disturbed habitat	0	0 : 1	0	69696	0	None Req
					: 1	0			
					: 1	0			
					: 1	0			
Staging Area #2	No	O&M	disturbed habitat	0	0 : 1	0	65340	0	None Req
					: 1	0			
					: 1	0			
					: 1	0			

Pole Number	Preserve	Work type	Habitat Type	Permanent Impacts (Sq. ft.)	Perm Impact Drawdown Ratio	Perm Impact Credit Drawdown (Sq. ft.) (Mitigagion)	Temp Impacts (Sq. ft.)	Temp Impacts Credit Drawdown (Sq. ft.) (Mitigation)	Enhancement
Staging Area #3	No	O&M	disturbed habitat	0	0 : 1	0	65340	0	None Req
					: 1	0			
					: 1	0			
					: 1	0			
Staging Yard #4	Yes	O&M	disturbed habitat	0	0 : 1	0	21780	0	None Req
					: 1	0			
					: 1	0			
					: 1	0			
Helicoptor Site	No	O&M	disturbed habitat	0	0 : 1	0	26136	0	None Req
					: 1	0			
					: 1	0			
					: 1	0			
Total Perm Impacts (Pole Sites)				374.50	Mitigation	15.00	22414.25	Total Temp Impacts (Pole Sites)	
Total Perm Impacts (Staging Areas)				0.00	Additional Mitigation	0.00	248292.00	Total Temp Impacts (Staging Areas)	
Total Perm Impacts (Sum)				374.50	Total Mitigation Credit	15.00	270706.25	Total Temp Impacts (Sum)	
90sf of impacts occur from trenching bringing the Grand Total Mitigation Credit to 568.5 sf. Total Mitigation Credit Drawdown 568.5sf (Permanent & Temp Impacts)							464		Total Mitigation Credit

Appendix

Exhibit E

Survey – TL698 Tangent Pole Structures on Leatherbury Property

March 9, 2011

NOLTE
BEYOND ENGINEERING

Mr. Alan E. Dusi, PE
San Diego Gas and Electric Company
Project Manager – Construction Services
Mail Location – CP21C

SUBJECT: WOOD TO STEEL POLE REPLACEMENT, LEATHERBURY PROPERTY EAST OF GIRD ROAD, IN THE COUNTY OF SAN DIEGO, STATE OF CALIFORNIA.

SURVEY REQUEST NO. S110127
JOB NUMBER: R110171
WORK ORDER: 2901970

Dear Alan:

On March 5 and 7, 2011 a Nolte survey crew measured poles Z19386 thru Z511487 in TL698. Per your request the survey measured the ground at the base of each pole, measured the top of pole above ground, and measured the ends of each crossarm. The measurements above ground were performed using a reflectorless total station EDM instrument. The reflectorless measurements can achieve an accuracy of +/- 0.04 feet while not exceeding manufacturer specifications for maximum length of shot.

Each pole surveyed has a field sketch with the point number shot, the top of pole distance above ground and crossarm length indicated. If you need additional information or have any questions please contact me directly at 858.385.2110 or email jeffrey.safford@nolte.com.

Best regards,

3/9/11

Jeffrey J. Safford, PLS 6703 Date
Associate | Survey Manager

NOLTE ASSOCIATES, INC.
15070 AVENUE OF SCIENCE, SUITE 100
SAN DIEGO, CA 92128-3412
858.385.0500 TEL 858.385.0400 FAX
WWW.NOLTE.COM

NOLTE
BEYOND ENGINEERING

MEMORANDUM

TO:	**SDG&E**	**DATE:**	**03/16/2011**
FROM:	**Timothy Davis**	**PROJ #:**	**R110171/S110108/SDB6298**
SUBJECT:	**Basis of Bearing/Elevation**		**Wood to Steel Pole Replacement-Leatherbury Trust**

Nolte performed a field survey on 3/4/2011 to 3/7/2011 to determine the width of the cross-arms on the new steel poles located on the Leatherbury Trust easement in Pala-Monserate, San Diego County. During the course of the field survey, Nolte crews inversed the distances between the reflector-less shots at the ends of the 69kv and 12kv cross-arms to the center of the pole("E" of the figure) at ground elevation. Due to the configuration of the cross-arm, the inverse distances were misleading, as those distances were "hypotenuse" distances measured from the end of the arm to the center of the pole (distance "A" of the figure).

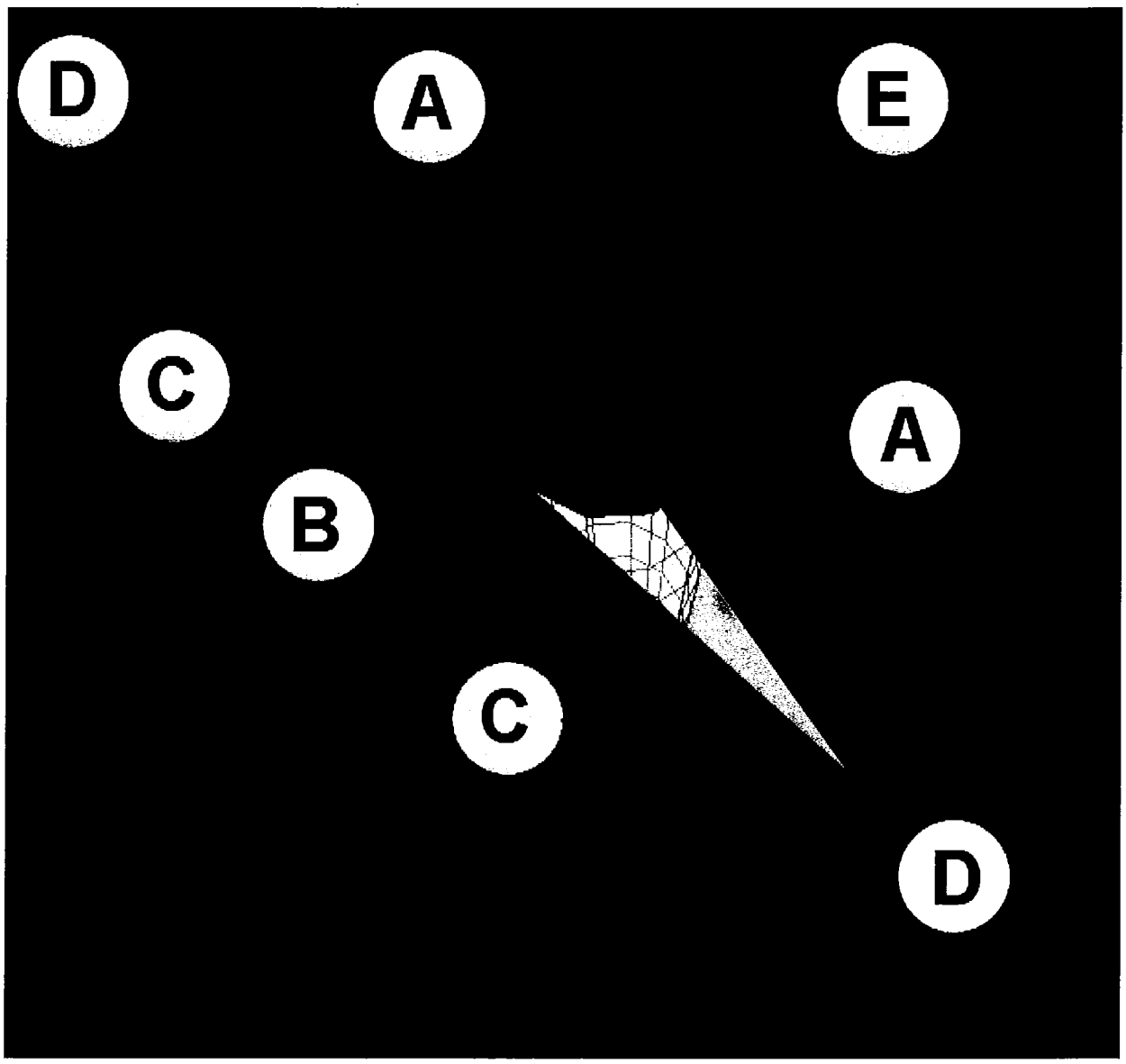
The distances have been edited on the pole up sheets, and additional points were calculated and shot, at the centerline of the pole at the face of the arms, to show the actual arm lengths, ("B" and "C" of the figure).

Please contact Jeff Safford or me if there are any questions regarding this narrative.

3/16/2011

Timothy Davis, PLS 8332

Field Survey Manager


D
A
E
C
A
B
C
D

NOLTE
BEYOND ENGINEERING
15070 Avenue of Science, Suite 100 San Diego, CA 92128
858.385.0500 TEL 858.385.0400 FAX www.nolte.com

Job Numbers

SDGE Job Number: R110171
Survey Number: S110108
Nolte Job Number: SDB629800

Job Information

Job Type:	TMRE	Sheet 1 of 39	
DPSS Number:	850845-020	Date:	03/16/2011
W.O. Number:	2901970	Survey Crew:	TD/JA/TL
T.B. Number:	1048-E2		

Job Name: WOOD TO STEEL POLE REPLACEMENT

Job Address: LEATHERBURY PROPERTY, E/O GIRD RD.

Bench Mark: Elevations shown are on the NAVD88 Datum, determined from CORS station **Temecula El.=1124.489**

Basis of Bearings: Basis of Bearings are Grid North as determined by CORS station **Temecula.**

Basis of Coordinates: The Basis of Horizontal Coordinates for this survey is the North American Datum of 1983 (Epoch 2007.00) and are expressed in terms of the California Coordinate System 1983, Zone VI based off CORS station **Temecula.** **N=1652012.891 E=6817867.714**

Job Directories

Data Directory Path:	N:\SDGE\R110171\S110127\Survey\Field Data \PALATD_1.dc
Points Directory Path:	N:\SDGE\R110171\S110127\Survey\Field Data \PALA-TD-20110316.csv
Photograph Directory Path:	N:\SDGE\R110171\S110127\Images\Photos\Poles 20110307 JA
Interactive Google:	N/A

Additional information

Re-shot insulators on pole Z511487 and revised complete package see notes.

Device: Survey Controller on ActiveSync

Receive operation Completed.
2 File(s) Successfully Transferred.
Details are as follows:

12:17:42 PM 3/7/2011 Received File
N:\SDGE\R110171\S110127\Survey\Field Data\PALATD_1.dc from Default.
No Error
12:17:44 PM 3/7/2011 Received File
N:\SDGE\R110171\S110127\Survey\Field Data\PALATD.csv from Default.
No Error

PALA MONSERATE

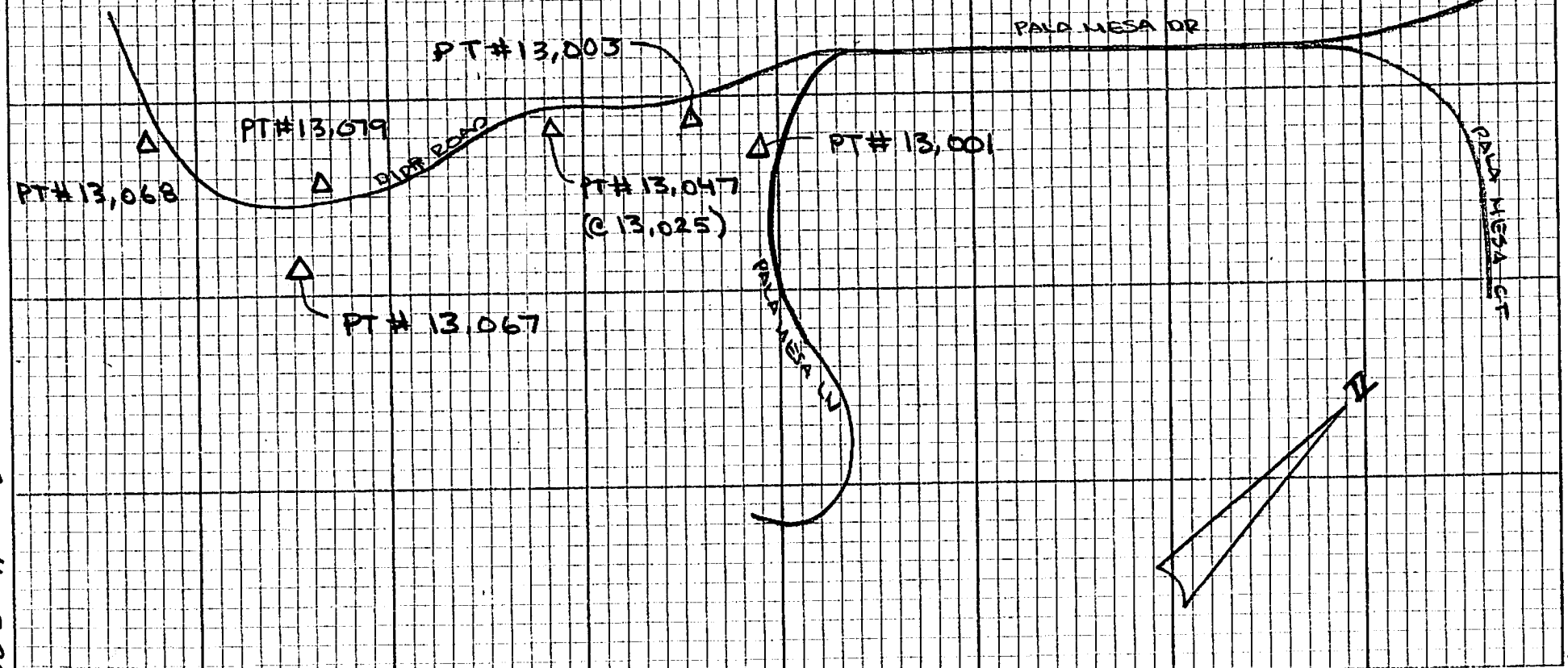
CONTROL & POLE SKETCH

3-5-11

TD - JA

— PALA MONSERATE —
CONTROL SKETCH

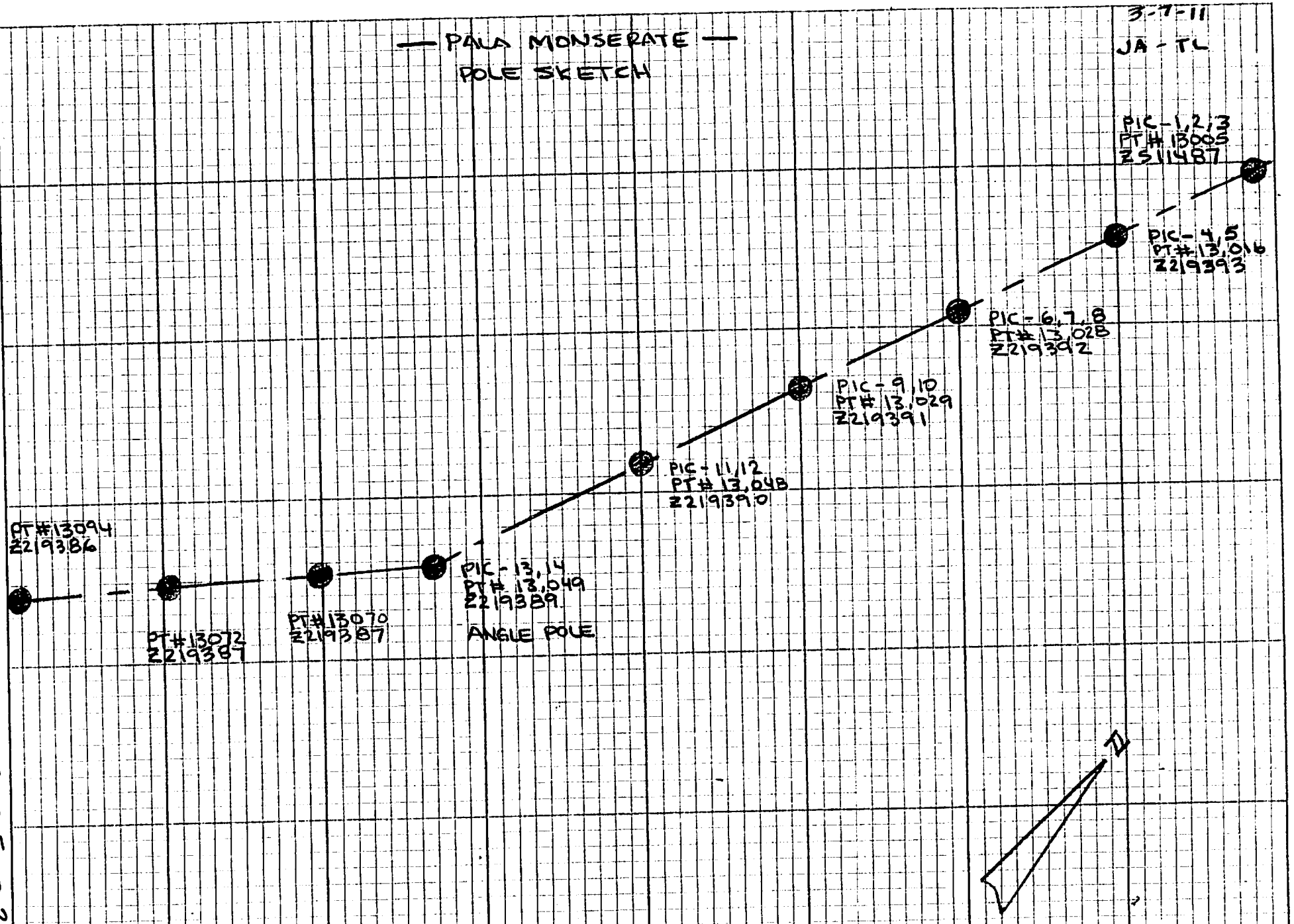
3-7-11
JA - TL



SHT 4 OF 39

3-7-11
JA - TL

PALA MONSERATE
POLE SKETCH



SHT 5 OF 39

PALA MONSERATE

3-5-11
TD-JA

LOC NEW STEEL POLES / WIDTH MEAS

HI: 6.562 MRN (CALVRS)

CHECK TO: (N-61 SECTION COR
(ΔN=-.02 ΔE=.07 ΔEL .07)

PT	DESCRIPTION
13,001	SET MAG NAIL ON PAVEMENT ROAD (PALA MESA DR.) 2' FT ± FROM EDGE OF PAVEMENT / ± 150' SOUTH EAST OF POLE Z511487.
13,003	SET 60D NAIL ALONG DIRT ROAD ROUGHLY ABOUT 15' NORTH OF POLE Z219393.
13,025	SET 60D NAIL/FEATHER ROUGHLY 30' SOUTH OF DIRT ACCESS ROAD & ± 50' FROM POWER LINE.
13,026	SET 60D NAIL AT TOP OF HILL ROUGHLY 100' FROM POLE Z219392 SOUTHWEST
13,027	RE-SHOT 13025 WITH TOOLON
13,000	MO FD IP/TAK - FD IP W/TAK @ NLY FNCLN @ ORIG PT#61 (ΔN=.02 ΔE=.07 ΔEL=.07)
13,067	SET 60D NAIL ROUGHLY 200' SOUTH OF POWER LINE / BETWEEN POLE Z219389 & Z219388
13,068	SET 60D NAIL & FEATHER ON DIRT ROAD ± 100' NORTH-ELY FROM POLE Z219386

3-5-11

TO -DA

HI: 5.3 @ 13001

HT: 6.88 @ 13003 W/00°-00'-00"

(Δ H: 0.05 V: 0.10)

PT #	PT ID	DESCR.
13,005		ECPP Z511481 @ HIGHEST GRADE (HA OFFSET TO CNTR POLE)
13,016		ECPP Z219393 @ HIGHEST GRADE (HA OFFSET TO LOC CNTR)
13,006 - 13,015		POLE SHOTS (ECOH)
13,018 - 13,024		
*		(B/S CHK Δ=00°-00'-16")

//

HI: 5.16 @ 13026

HT: 7.10 @ 13025 W/00°-00'-00"

H: 0.08 V: 0.09

PT	DESCRIPTION
13,027	ECGN NEW GUY ANC @ GRND NLY OF POLE Z219392
13,028	ECPP Z219392 @ HIGHEST GRADE (HA OFFSET TO LOC CN
13,029	ECPP Z219391 @ HIGHEST GRADE (HA OFFSET TO LOC CN
13,030 - 13,038	UP SHOTS @ ECPP Z219392
13,039 - 13,046	UP SHOTS @ ECPP Z219391
13,047 (LAST)	RE-SHOT POSITION @ CP-13025, HOLDING COORD @ 13026 AND LINE TO 13025

HI: 5.31
HT: 4.90

T @ CP-13047 {60D NAIL → RESHOT FRM 13026@13025)

B/S @ CP-13026 N100°-00'-00"

(Δ H: .01 ΔV: .00)

PT #	PT ID	DESCRIPTION
13,048	ECPP Z219390	@ HIGHEST GRND (HA OFFSET TO LOC CNTR)
13,049	ECPP Z219389	@ HIGHEST GRND (HA OFFSET TO LOC CNTR)
13,067	CP60D	
13,068	CP 60D	
13,069	ECGY FOR Z51187	

3-7-11

HI: 5.32
HT: 4.90

@ 13,067
@ 13,068 5600 / TSC2

JA-TL

(ΔH = -0.018 ΔV = 0.039)

PT	PT ID	DESCRIPTION
13,070	ECPP Z219388	@ HIGHEST GRND (HA OFFSET TO LOC CNTR
13,071	ECGY @ POLE Z219388	
13,072	ECPP Z219387	(HA OFFSET TO LOC CNTR)
13,073	ECGY NORTH-W'LY	
13,074	ECGY SOUTH-E'LY	
13,075	ECPP Z219386	(HA OFFSET TO LOC CNTR)
13,076	ECGY NORTH-W'LY	
13,077	ECGY SOUTH-E'LY	
13,079	SET 60D NAIL ± 30' NORTHERLY FROM RD IN BETWEEN POLES Z219388 AND Z219387	

3-7-11

JA, TL

HI: 5.34 A @ 13079

HT: 4.90 B.S @ 13068 5600 / TSC2

(H= -0.009 V= 0.051)

PT	PT ID	DESCRIPTION
13075 + 0 13083	UP SHOTS (ECOH) @ ECPP Z219388	
13092	UP SHOTS @ Z 219388	
13093	UP SHOTS @ Z219388	
13084 - 13091	UP SHOTS (ECOH) @ ECPP Z219387	

//

HI:

HT: 5.03

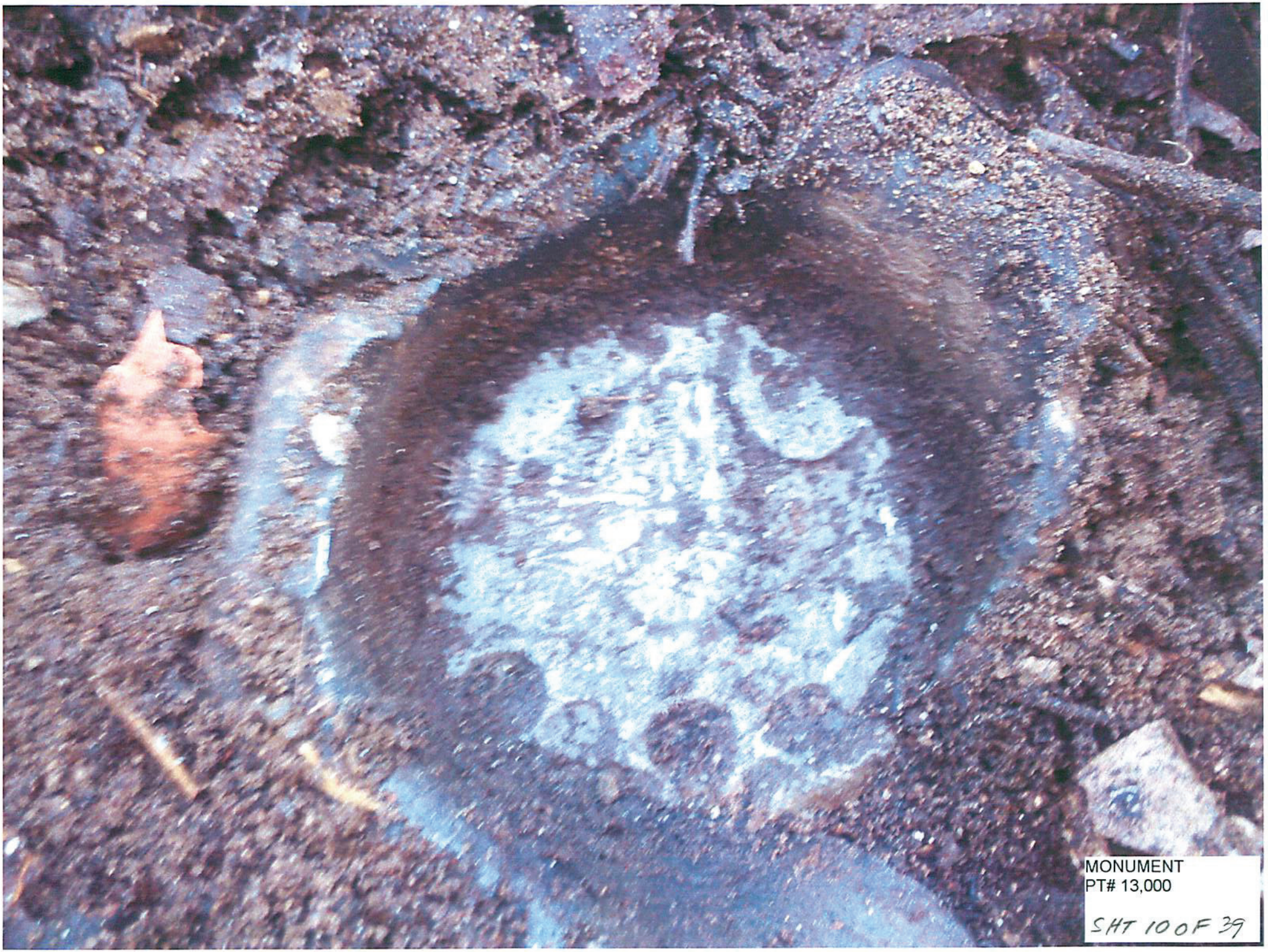
(H: 0.60

A @ 13068

B.S @ 13079 5600 / TSC2

V: 0.021)

PT	PT ID	DESCRIPTION
13094	ECPP Z219386	
13095 - 13104	UP SHOTS @ Z219386	
13105 - 13106	X-ARMS @ Z219387	


MONUMENT
PT# 13,000
SHT 100F 39


CONCRETE MIX
MONUMENT
PT# 13,000
SHT 11 OF 39


MONUMENT
PT# 13,000
LOOKING N'LY

PT#	NORTHING	EASTING	ELEVATION	NOLTE DESCRIPTION	PLS DESCRIPTION	PLS#	DATE	TIME(PDST)
13000	2064714.939	6274173.033	275.847	MO FD IP/TAK				
13001	2067519.379	6278503.923	463.287	CP MAG				
13003	2067479.474	6278307.679	448.408	CP MAG				
13004	2067609.145	6278490.654	518.813	CP MAG				
13005	2067609.92	6278491.016	454.704	ECPP Z51187				
13006	2067609.133	6278490.772	518.825	ECOH	Top of Pole307	307	3/5/2011	12:27:35
13010	2067614.948	6278488.275	499.03	ECOH	12KV@ Pole/Arm330	330	3/5/2011	12:37:08
13011	2067604.884	6278494.8	498.954	ECOH	12KV@ Pole/Arm330	330	3/5/2011	12:38:07
13012	2067605.311	6278486.467	495.124	ECOH	12KV@ Pole/Arm330	330	3/5/2011	12:46:43
13013	2067606.893	6278485.415	495.092	ECOH	12KV@ Pole/Arm330	330	3/5/2011	12:52:13
13014	2067613.801	6278495.204	494.701	ECOH	12KV@ Pole/Arm330	330	3/5/2011	12:53:02
13015	2067611.862	6278496.549	494.967	ECOH	12KV@ Pole/Arm330	330	3/5/2011	12:53:30
13016	2067470.986	6278304.277	452.977	ECPP Z219393				
13017	2067471.485	6278304.697	516.31	ECOH	Top of Pole307	307	3/5/2011	12:59:36
13018	2067475.866	6278301.929	516.128	ECOH	69 KV@Pole/Arm331	331	3/5/2011	13:02:18
13019	2067466.733	6278306.632	511.848	ECOH	69 KV@Pole/Arm331	331	3/5/2011	13:03:49
13020	2067475.837	6278301.914	507.21	ECOH	69 KV@Pole/Arm331	331	3/5/2011	13:05:03
13021	2067476.87	6278302.103	496.631	ECOH	12KV@ Pole/Arm330	330	3/5/2011	13:09:22
13022	2067466.667	6278308.353	496.378	ECOH	12KV@ Pole/Arm330	330	3/5/2011	13:10:56
13023	2067466.467	6278306.147	485.708	ECOH	12KV@ Pole/Arm330	330	3/5/2011	13:12:34
13024	2067474.988	6278300.919	485.725	ECOH	12KV@ Pole/Arm330	330	3/5/2011	13:13:22
13025	2066597.005	6277186.431	376.269	CP 60D				
13026	2067174.762	6277948.433	485.679	CP 60D				
13027	2066596.954	6277186.365	368.65	ECGY				
13028	2067240.922	6277995.382	488.446	ECPP Z219392				
13029	2066981.837	6277647.771	427.71	ECPP Z219391				
13030	2067240.58	6277995.052	559.057	ECOH	Top of Pole307	307	3/5/2011	14:44:32
13031	2067244.825	6277992.064	558.799	ECOH	69 KV@Pole/Arm331	331	3/5/2011	14:45:51
13032	2067236.731	6277998.695	554.214	ECOH	69 KV@Pole/Arm331	331	3/5/2011	14:47:28
13033	2067244.847	6277992.034	549.695	ECOH	69 KV@Pole/Arm331	331	3/5/2011	14:48:08
13034	2067244.529	6277990.585	536.225	ECOH	12KV@ Pole/Arm330	330	3/5/2011	14:53:23
13035	2067235.285	6277998.185	535.808	ECOH	12KV@ Pole/Arm330	330	3/5/2011	14:54:47
13036	2067238.042	6277989.945	532.053	ECOH	12KV@ Pole/Arm330	330	3/5/2011	14:56:53
13037	2067235.927	6277991.459	531.946	ECOH	12KV@ Pole/Arm330	330	3/5/2011	14:57:20
13038	2067243.355	6278000.832	531.968	ECOH	12KV@ Pole/Arm330	330	3/5/2011	14:57:58
13039	2066982.021	6277648.184	502.384	ECOH	Top of Pole307	307	3/5/2011	14:59:53
13040	2066986.092	6277645.043	502.381	ECOH	69 KV@Pole/Arm331	331	3/5/2011	15:00:53
13041	2066977.484	6277650.737	497.771	ECOH	69 KV@Pole/Arm331	331	3/5/2011	15:01:59
13042	2066986.137	6277644.9	493.313	ECOH	69 KV@Pole/Arm331	331	3/5/2011	15:02:40
13043	2066987.449	6277645.471	471.86	ECOH	12KV@ Pole/Arm330	330	3/5/2011	15:03:30
13044	2066987.441	6277645.461	467.057	ECOH	12KV@ Pole/Arm330	330	3/5/2011	15:04:16
13045	2066977.223	6277651.744	467.222	ECOH	12KV@ Pole/Arm330	330	3/5/2011	15:04:55
13046	2066977.324	6277651.899	471.85	ECOH	12KV@ Pole/Arm330	330	3/5/2011	15:05:44
13047	2066596.956	6277186.367	376.147	CP 60D@13025				
13048	2066744.212	6277329.367	387.671	ECPP Z219390				
13049	2066462.408	6276952.751	360.256	ECPP Z219389				
13050	2066743.838	6277328.942	461.598	ECOH	Top of Pole307	307	3/5/2011	16:06:07
13051	2066748.124	6277326.108	461.479	ECOH	69 KV@Pole/Arm331	331	3/5/2011	16:06:48
13052	2066739.714	6277332.008	457.023	ECOH	69 KV@Pole/Arm331	331	3/5/2011	16:07:41
13053	2066748.234	6277326.099	452.504	ECOH	69 KV@Pole/Arm331	331	3/5/2011	16:08:20
13054	2066748.357	6277324.912	436.617	ECOH	12KV@ Pole/Arm330	330	3/5/2011	16:09:41
13055	2066738.53	6277331.791	436.5	ECOH	12KV@ Pole/Arm330	330	3/5/2011	16:10:39
13056	2066462.031	6276953.693	434.184	ECOH	Top of Pole307	307	3/5/2011	16:12:21
13057	2066466.098	6276950.542	434.179	ECOH	69 KV@Pole/Arm331	331	3/5/2011	16:12:56
13058	2066457.323	6276955.779	429.531	ECOH	69 KV@Pole/Arm331	331	3/5/2011	16:13:43

PT#	NORTHING	EASTING	ELEVATION	NOLTE DESCRIPTION	PLS DESCRIPTION	PLS#	DATE	TIME(PDST)
13059	2066466.232	6276950.395	425.185	ECOH	69 KV@Pole/Arm331	331	3/5/2011	16:14:24
13060	2066467.735	6276950.763	409.407	ECOH	12KV@ Pole/Arm330	330	3/5/2011	16:15:21
13061	2066457.478	6276956.964	408.97	ECOH	12KV@ Pole/Arm330	330	3/5/2011	16:16:17
13062	2066462.674	6276953.956	409.189	ECOH	Crossarm Attach662	662	3/5/2011	16:19:13
13063	2066743.397	6277328.356	436.564	ECOH	Crossarm Attach662	662	3/5/2011	16:20:11
13067	2065881.644	6276379.26	318.338	CP 60D				
13068	2065779.606	6275566.907	293.734	CP 60D				
13069	2067627.66	6278490.22	452.639	ECGY				
13070	2066190.239	6276589.464	357.445	ECPP Z219388				
13071	2066148.997	6276608.612	358.958	ECGY				
13072	2065928.727	6276021.604	303.737	ECPP Z219387				
13073	2065947.302	6276013.108	303.243	ECGY				
13074	2065910.24	6276029.914	304.242	ECGY				
13075	2066189.53	6276588.696	430.599	ECOH	Top of Pole307	307	3/7/2011	9:03:28
13076	2066193.946	6276586.258	430.358	ECOH	69 KV@Pole/Arm331	331	3/7/2011	9:05:57
13077	2066185.793	6276591.622	425.867	ECOH	69 KV@Pole/Arm331	331	3/7/2011	9:09:57
13078	2066194.136	6276586.332	421.415	ECOH	69 KV@Pole/Arm331	331	3/7/2011	9:10:38
13079	2066017.99	6276322.457	316.835	CP 60D MAG				
13080	2066194.555	6276584.86	405.679	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:37:47
13081	2066184.458	6276591.315	405.667	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:38:36
13082	2066194.603	6276584.902	400.747	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:39:06
13083	2066184.475	6276591.276	400.616	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:39:46
13084	2065929.088	6276021.682	387.189	ECOH	Top of Pole307	307	3/7/2011	9:41:52
13085	2065933.546	6276019.56	387.027	ECOH	69 KV@Pole/Arm331	331	3/7/2011	9:45:45
13086	2065924.579	6276023.546	382.549	ECOH	69 KV@Pole/Arm331	331	3/7/2011	9:46:37
13087	2065933.623	6276019.598	377.931	ECOH	69 KV@Pole/Arm331	331	3/7/2011	9:47:07
13088	2065922.996	6276022.97	350.17	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:48:25
13089	2065934.006	6276018.218	350.406	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:49:15
13090	2065923.011	6276023.057	346.478	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:50:08
13091	2065933.892	6276018.032	346.16	ECOH	12KV@ Pole/Arm330	330	3/7/2011	9:50:35
13092	2066189.524	6276588.078	405.711	ECOH	Crossarm Attach662	662	3/7/2011	9:55:15
13093	2066189.514	6276588.058	400.681	ECOH	Crossarm Attach662	662	3/7/2011	9:55:49
13094	2065692.093	6275507.788	290.926	ECPP Z219386				
13095	2065692.58	6275507.715	371.586	ECOH	Top of Pole307	307	3/7/2011	10:36:01
13096	2065696.937	6275506.15	371.341	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13097	2065687.505	6275508.991	366.83	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:40:31
13098	2065696.993	6275506.173	362.245	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:40:59
13099	2065686.85	6275510.607	344.496	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13100	2065698.21	6275506.776	344.578	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:42:09
13101	2065686.915	6275510.726	341.292	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:42:36
13102	2065698.204	6275506.752	341.452	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:43:05
13103	2065692.514	6275508.709	344.554	ECOH	Crossarm Attach662	662	3/7/2011	10:43:38
13104	2065692.542	6275508.748	341.396	ECOH	Crossarm Attach662	662	3/7/2011	10:44:15
13301	2067609.952	6278490.641	518.634	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13302	2067609.208	6278490.993	514.242	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13303	2067609.883	6278490.606	509.833	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13304	2067609.916	6278491.537	499.03	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13305	2067471.715	6278304.067	516.128	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13306	2067470.835	6278304.506	511.848	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13307	2067471.779	6278304.017	507.21	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13308	2067471.766	6278305.23	496.531	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13309	2067470.728	6278303.533	485.708	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13310	2067241.189	6277995.042	558.799	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13311	2067240.379	6277995.701	554.214	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13312	2067241.181	6277995.038	549.695	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03

PT#	NORTHING	EASTING	ELEVATION	NOLTE DESCRIPTION	PLS DESCRIPTION	PLS#	DATE	TIME(PDST)
13313	2067239.907	6277994.385	536.225	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13314	2066982.242	6277647.59	502.381	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13315	2066981.353	6277648.127	497.771	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13316	2066982.213	6277647.521	493.313	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13317	2066982.386	6277648.685	471.85	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13318	2066982.332	6277648.603	467.122	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13319	2066744.338	6277328.764	461.479	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13320	2066743.53	6277329.361	457.023	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13321	2066744.401	6277328.757	452.504	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13322	2066462.191	6276952.873	434.179	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13323	2066461.294	6276953.379	429.531	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13324	2066462.184	6276952.841	425.185	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13325	2066190.329	6276588.638	430.358	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13326	2066189.483	6276589.282	425.867	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13327	2066190.412	6276588.693	421.415	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13328	2065929.558	6276021.333	387.027	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13329	2065928.577	6276021.801	382.549	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13330	2065929.627	6276021.342	377.931	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13331	2065928.5	6276020.594	350.17	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13332	2065928.451	6276020.545	346.478	ECOH	12KV@ Pole/Arm330	330	3/7/2011	10:41:32
13333	2065692.746	6275507.413	371.341	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13334	2065691.704	6275507.744	366.83	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
13335	2065692.79	6275507.421	362.245	ECOH	69 KV@Pole/Arm331	331	3/7/2011	10:37:03
16000	2067613.829	6278488.296	518.683	ECOH	Unkn Conductor-TW645	645	3/15/2011	18:49:20
16001	2067605.003	6278493.428	514.14	ECOH	Unkn Conductor-TW645	645	3/15/2011	18:50:26
16002	2067613.898	6278488.39	509.629	ECOH	Unkn Conductor-TW645	645	3/15/2011	18:50:57

POLE #	Reconductor & W-S Pole Count	Reconduct or Pole Replacement	W-S Pole Replacement	Pole Class	Total Width at Lowest Xsmn Insulator (Ft.)	Distribution Cross Arm Length (Ft.)	Remarks	Exist Pole Height	New Pole Height	W2S Height Increase, ft	Reconduct or Pole Replacment Height Increase, ft
219386	1		1	H5	11.7	12	LEATHERBURY	61	81	20	
219387	1	1		H5	11.7	12	LEATHERBURY	65.5	84		18.5
219388	1	1		H5	11.7	12	LEATHERBURY	56.5	74.5		18
219389	1		1	H5	11.7	12	LEATHERBURY	56.5	74.5	18	
219390	1		1	H5	11.7	12	LEATHERBURY	56.5	74.5	18	
219391	1		1	H5	11.7	12	LEATHERBURY	56.5	76	19.5	
219392	1		1	H5	11.7	12	LEATHERBURY	52	71.5	19.5	
219393	1		1	H3	11.7	12	LEATHERBURY	61	65.5	4.5	
511487	1	2	1	H3	11.7	12	LEATHERBURY	56.5	65.5	9	
TOTALS	**9**	**2**	**7**				**Includes Interset Poles**			**108.5**	**36.5**
								Average Increase		**15.5**	**18.25**
									Average Increase - All Poles		**16.11**

Privileged and Confidential information pursuant to PU Code Section 583 and General Order 66-C

SHT 16 OF 39

NOLTE
BEYOND ENGINEERING

JOB NAME PALA INTERMEDIATE POLES

JOB NO. 5DB 62 9600

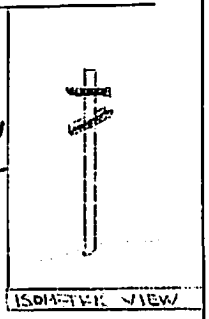
NOTES:

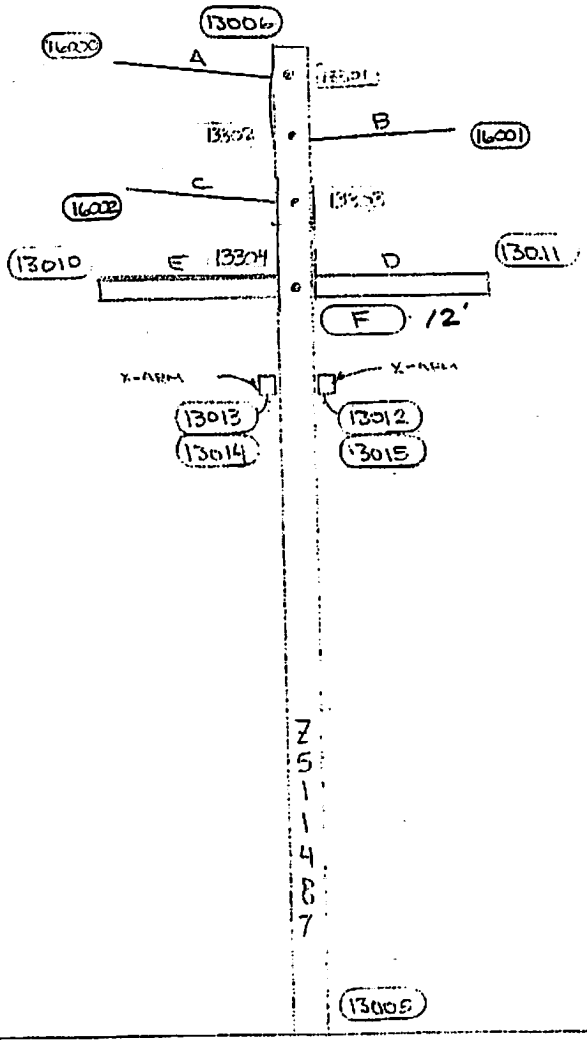
NOTE TAKER J. ALVARADO DATE 3/5/11

CHECKED BY T. Lindsay DATE 3/7/11

STRUCTURE # Z511487

Measure Height 64.1
Design Height 65.5





PT. NO.	DESC.	UP
	TOP OF POLE	64.1
16000	69KV POLE ARM	64.1
13501	℄ POLE @ ARM	59.9
16001	69KV POLE ARM	59.4
13502	℄ POLE @ ARM	55.5
16002	69 KV POLE ARM	54.9
13503	℄ POLE @ ARM	45.1
13010	12KV POLE ARM	44.3
13304	℄ 12 KV ARM	44.3
13011	12 KV POLE ARM	44.3
★	12KV ARM PARALLEL TO EARTHCAP	★
13012★	12KV POLE ARM	40.4
13013★	12KV POLE ARM	40.4
13014★	12KV POLE ARM	40.0
13015★	12KV POLE ARM	40.3
→	POLE ARM LENGTH	
(A)	4.53' ℄ TO END ARM	
(B)	4.86' ℄ TO END ARM	
(C)	4.53' ℄ TO END ARM	
(D)	5.99 ℄ TO END ARM	
(E)	5.99 ℄ TO END ARM	
(F)	11.99' TRIAL ARM LENGTH	
★ NOTE	GROUND ELEV. MEASURED AT	
	HIGHEST ADJACENT GRADE @	
	POLE - GROUND ELEV. AT POLE	
	VARIES ± 0.5 FT	

SEE PIC 1, 2 & 3

LOOKING NORTHEAST

NOLTE: H:\SURVEY\SURVEY FORMS\SURVEY POLE UPS(SHT 2).DWG

POLE Z511487
PT# 13,005
LOOKING N'LY

POLE Z511487
PT# 13,005
LOOKING W'LY

SHT 20 OF 39

NOLTE
BEYOND ENGINEERING

JOB NAME PALA HOUSEHOLD

JOB NO. SDR 629800

NOTES:

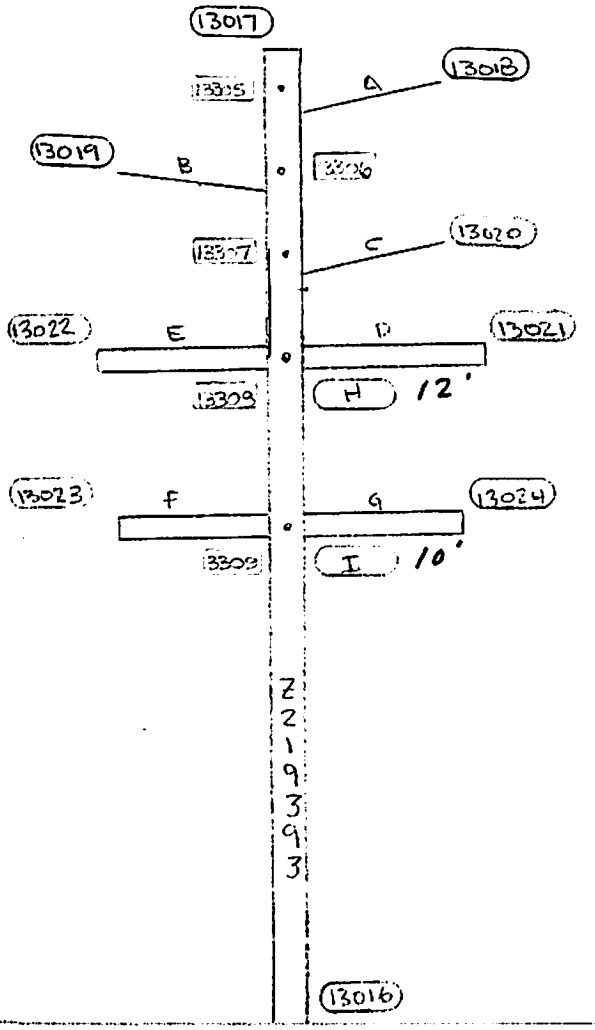
NOTE TAKER J. ALVARADO DATE 3/5/11

CHECKED BY T. Lindsay DATE 3/7/11

STRUCTURE # Z219393

Measure Height 63.3'

Design Height 65.5'

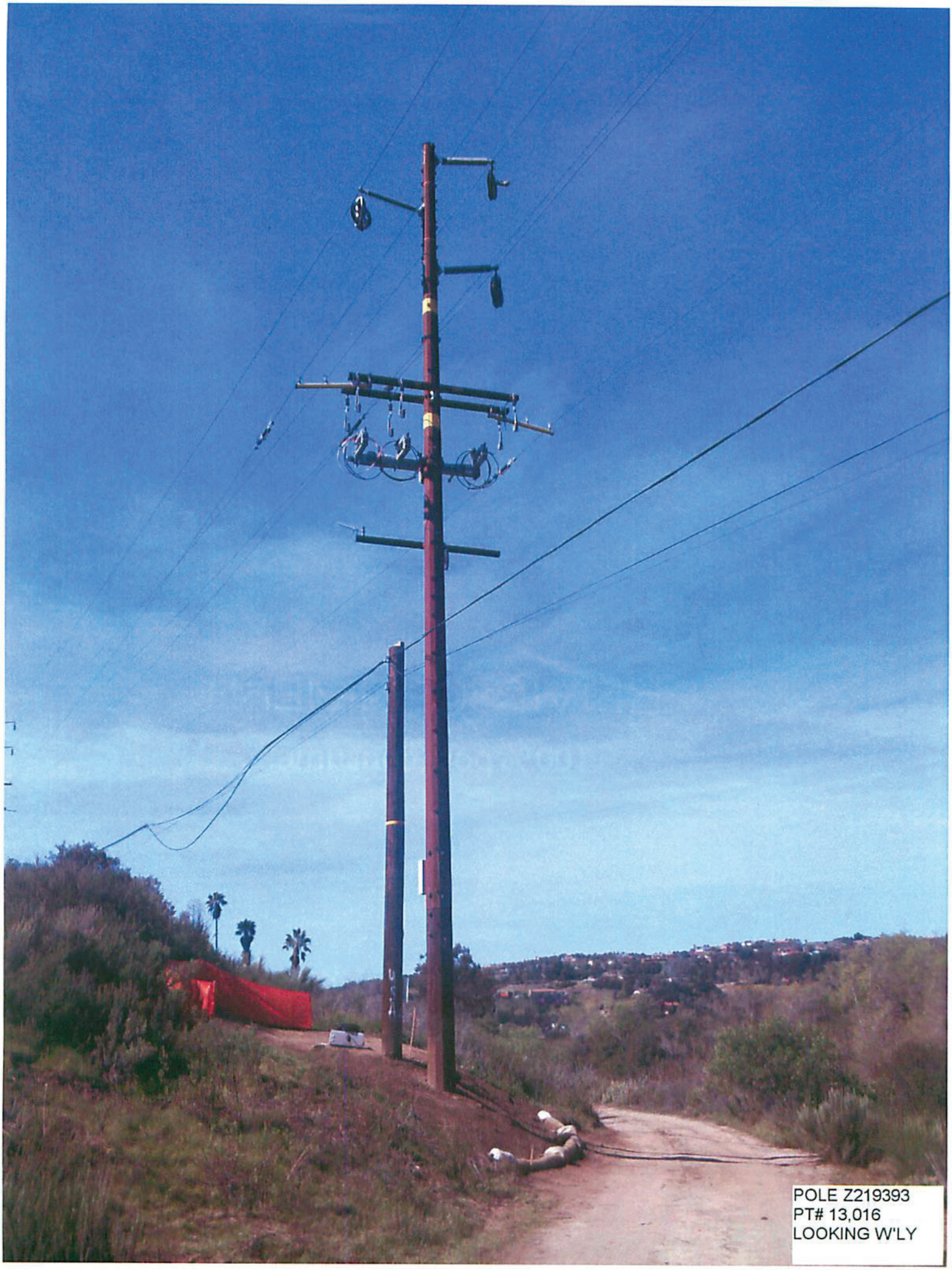


PT. NO.	DESC.	UP
	TOP OF POLE	63.3
13018	69KV POLE ARM	63.2
13305	℄ POLE @ TOP I ARM	63.2
13019	69KV POLE ARM	58.9
13306	℄ POLE @ MID I ARM	58.9
13020	69KV POLE ARM	54.2
13307	℄ POLE @ BTM I ARM	54.2
13021	12KV POLE ARM	43.7
13308	℄ POLE @ 12KV ARM	43.6
13022	12KV POLE ARM	43.4
13023	12KV POLE ARM	32.7
13309	℄ POLE @ 12KV ARM	32.7
13024	12KV POLE ARM	32.7
→	POLE ARM LENGTHS	←
(A)	4.67' ℄ POLE TO END I. ARM	
(B)	4.62' ℄ POLE TO END I. ARM	
(C)	4.58' ℄ POLE TO END I. ARM	
(D&E)	5.985' ℄ POLE TO END 12KV ARM	
(H)	11.93' TOTAL ARM LENGTH (12KV TOP)	
(F&G)	4.993' ℄ POLE TO END 12KV ARM	
(I)	9.993' TOTAL ARM LENGTH (12KV BTM)	
*NOTE:	GROUND ELEV. MEASURED AT	
	HIGHEST ADJACENT GRADE @	
	POLE - GROUND ELEV. AT POLE	
	VARIES ± 0.5 FT	

LOOKING NW'LY

NOLTE: H:\SURVEY\SURVEY FORMS\SURVEY POLE UPS(SHT 2).DWG

POLE Z219393
PT# 13,016
LOOKING SOUTH-E'LY



SHT 23 OF 39

NOLTE
BEYOND ENGINEERING

PAGE 24 OF 29

JOB NAME DALA FARMSTEAD

JOB NO. 508629800

NOTES:

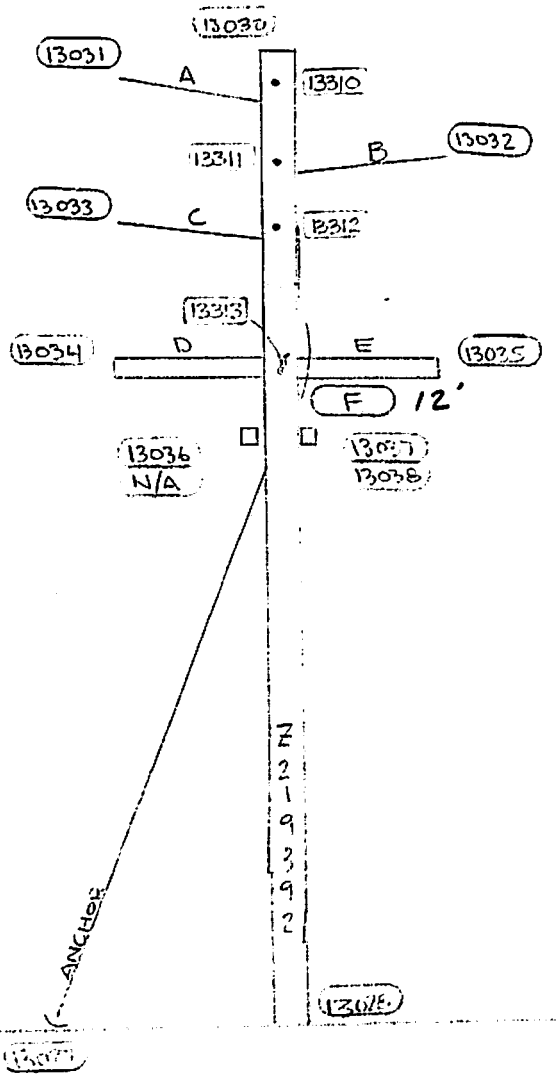
NOTE TAKER J. ALVARADO DATE 3/5/11

CHECKED BY DATE 3/7/11

STRUCTURE # Z219392

Measure Height 70.6'

Design Height 71.5'

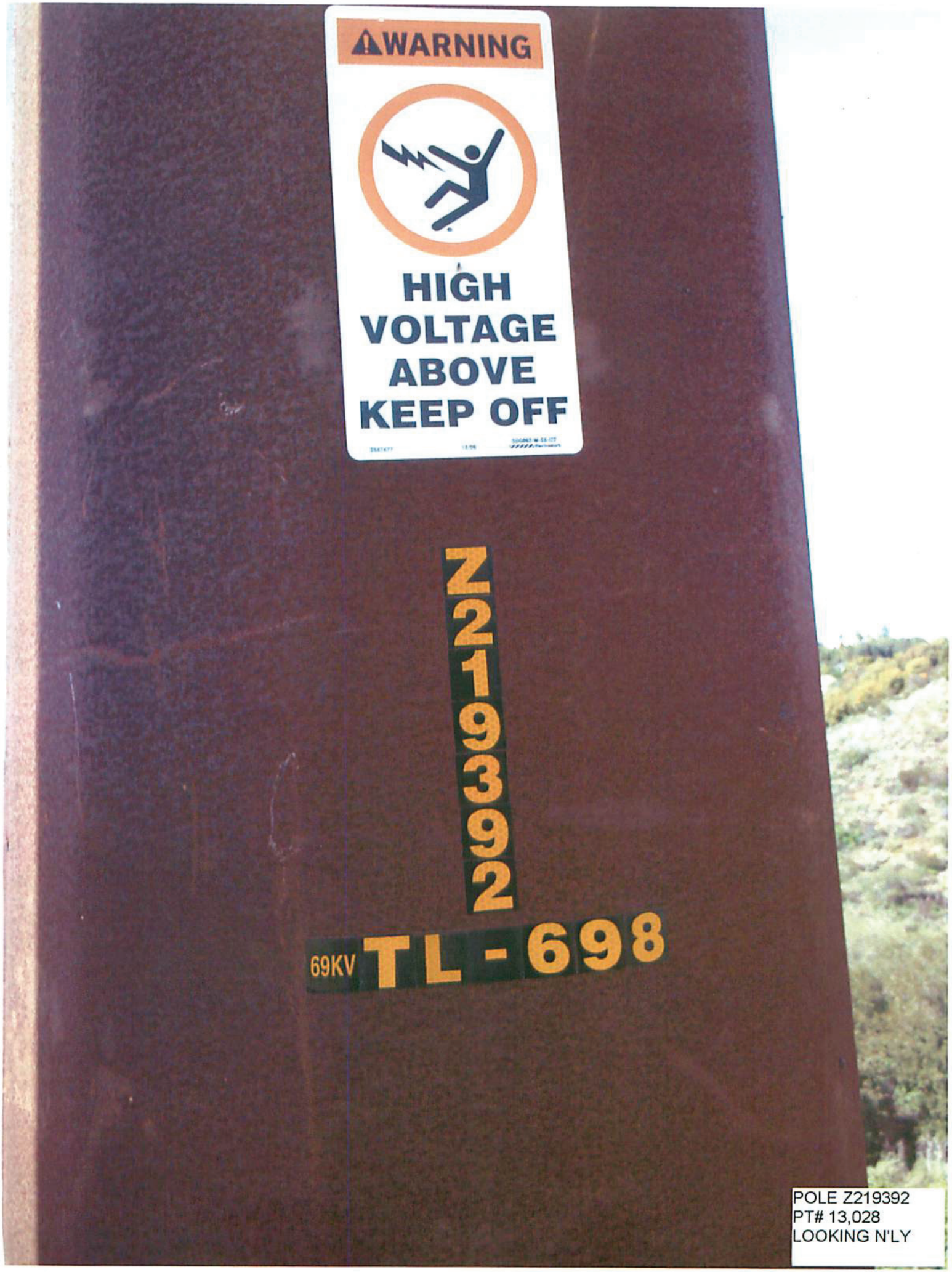


PT. NO.	DESC.	UP
	TOP OF POLE	70.6'
13031	69KV POLE ARM	70.4
13310	℄ POLE @ TOP I. ARM	70.4
13032	69KV POLE ARM	65.5
13311	℄ POLE @ MID I. ARM	65.8
13033	66KV POLE ARM	61.2
13312	℄ POLE @ BTM I. ARM	61.2
13034	12KV POLE ARM	47.8
13313	℄ POLE @ 12KV ARM	47.6
13035	12KV POLE ARM	47.4
13036	12KV POLE ARM	-13.6
13037	12KV POLE ARM	43.5
13038	12KV POLE ARM	43.5
⟷	POLE ARM LENGTH	4'
(A)	4.70' ℄ POLE TO END I. ARM	
(B)	4.72' ℄ POLE TO END I. ARM	
(C)	4.74' ℄ POLE TO END I. ARM	
(D+E)	5.98' ℄ POLE TO END 12KV ARM	
(F)	11.97' 12KV TOTAL ARM LENGTH	

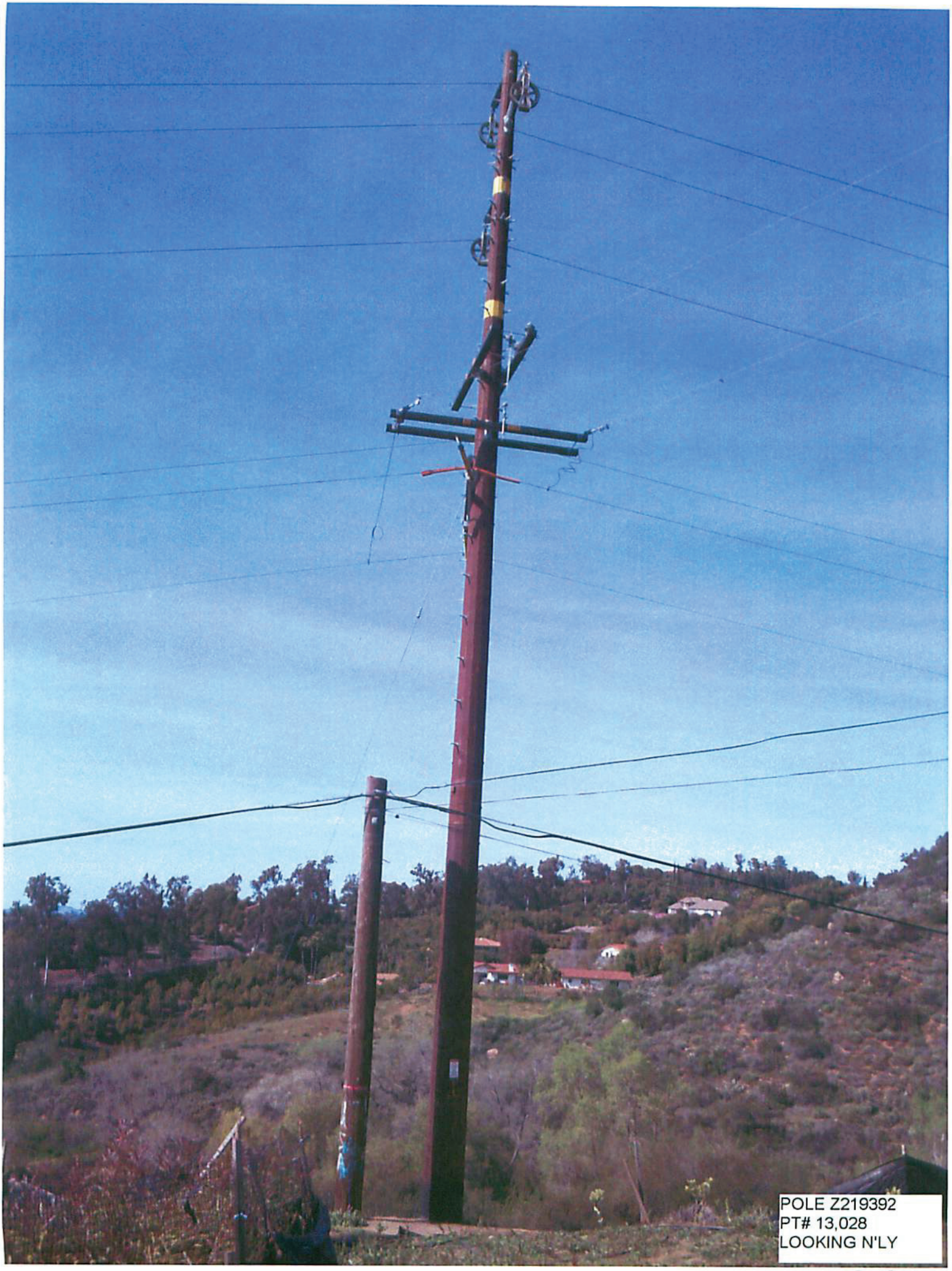
* NOTE: GROUND ELEVATION MEASURED AT HIGHEST ADJACENT GRADE @ POLE - GROUND ELEVATION AT POLE VARIES ± .5FT

LOOKING NORTH-EAST

NOLTE: H:\SURVEY\SURVEY FORMS\SURVEY POLE UPS(SHT 2).DWG



POLE Z219392
PT# 13,028
LOOKING N'LY



SHT 26 OF 39


POLE Z219392
PT# 13,028
LOOKING E'LY

NOLTE
BEYOND ENGINEERING

JOB NAME PALA MOUSSELINE JOB NO. SDB.629800

NOTES:

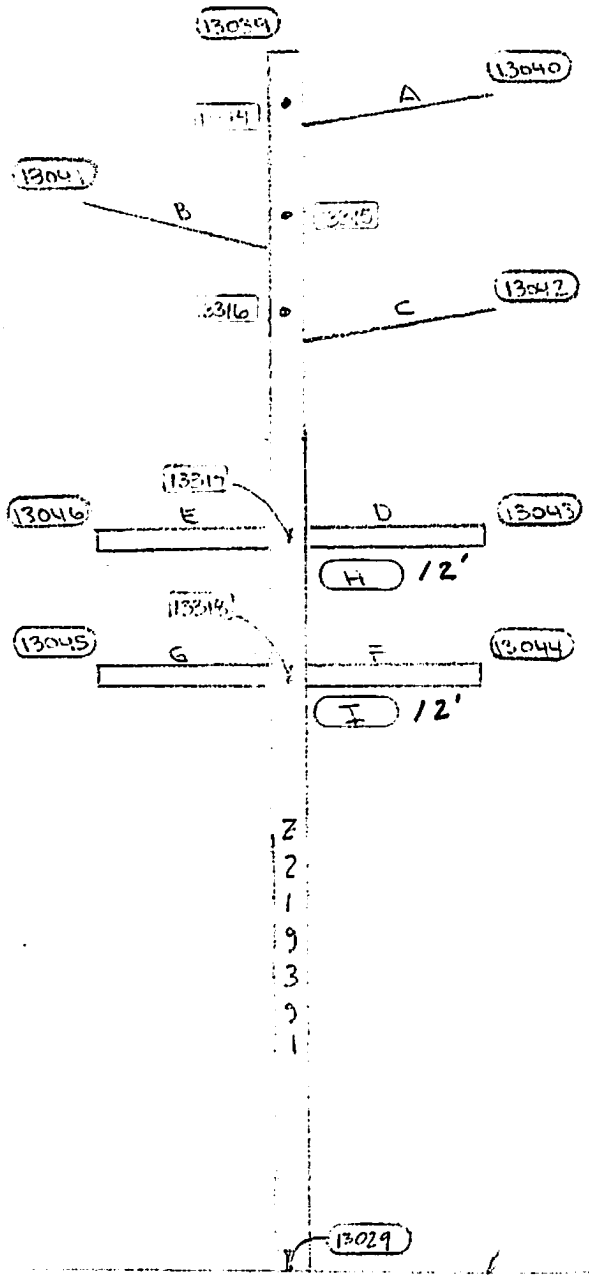
NOTE TAKER J. ALVARADO DATE 3/5/11

CHECKED BY T. LINDSAY DATE 3/7/11

STRUCTURE # Z219391 (STEEL POLE)

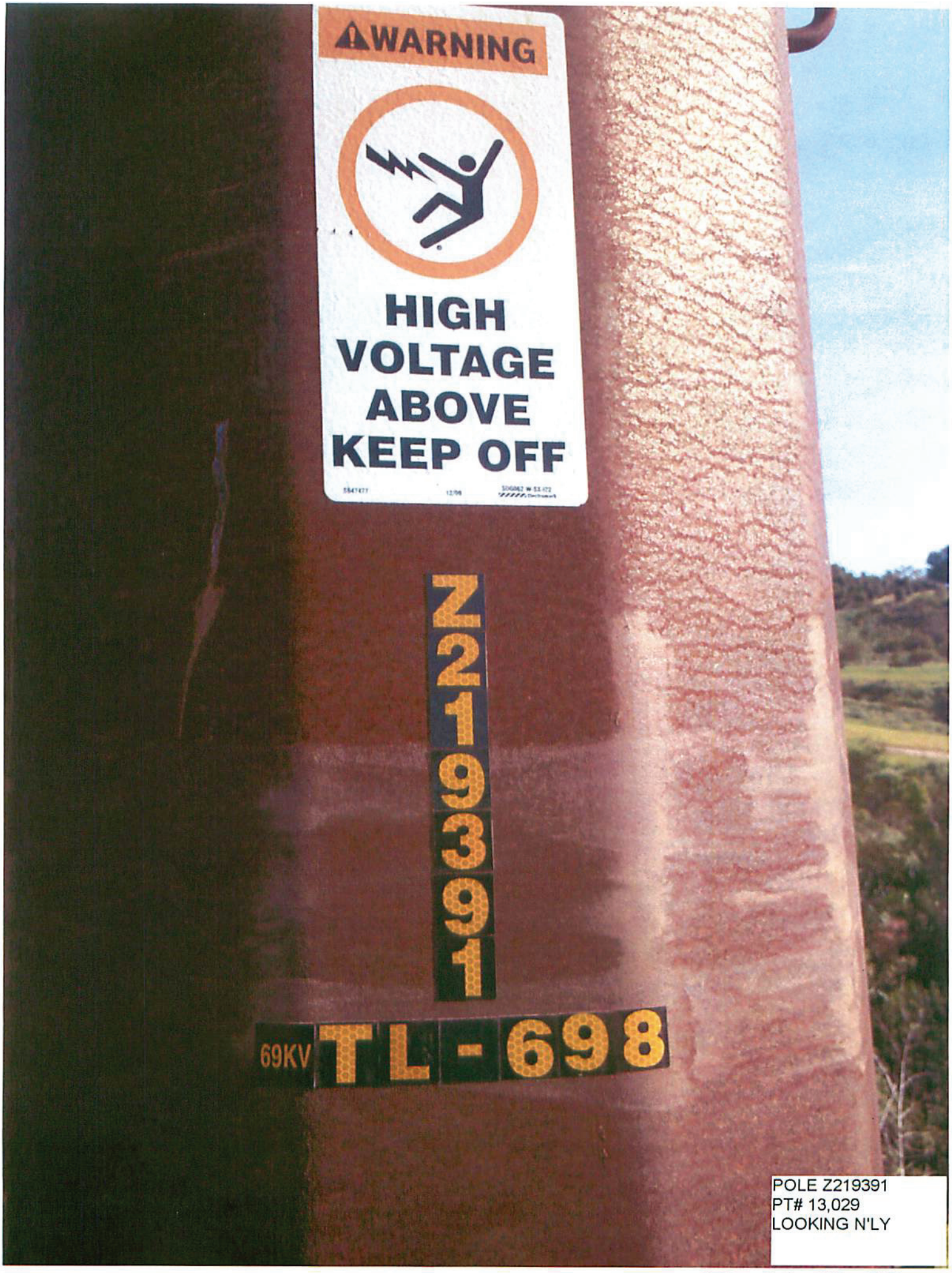
Measure Height 74.7'

Design Height 76.0'

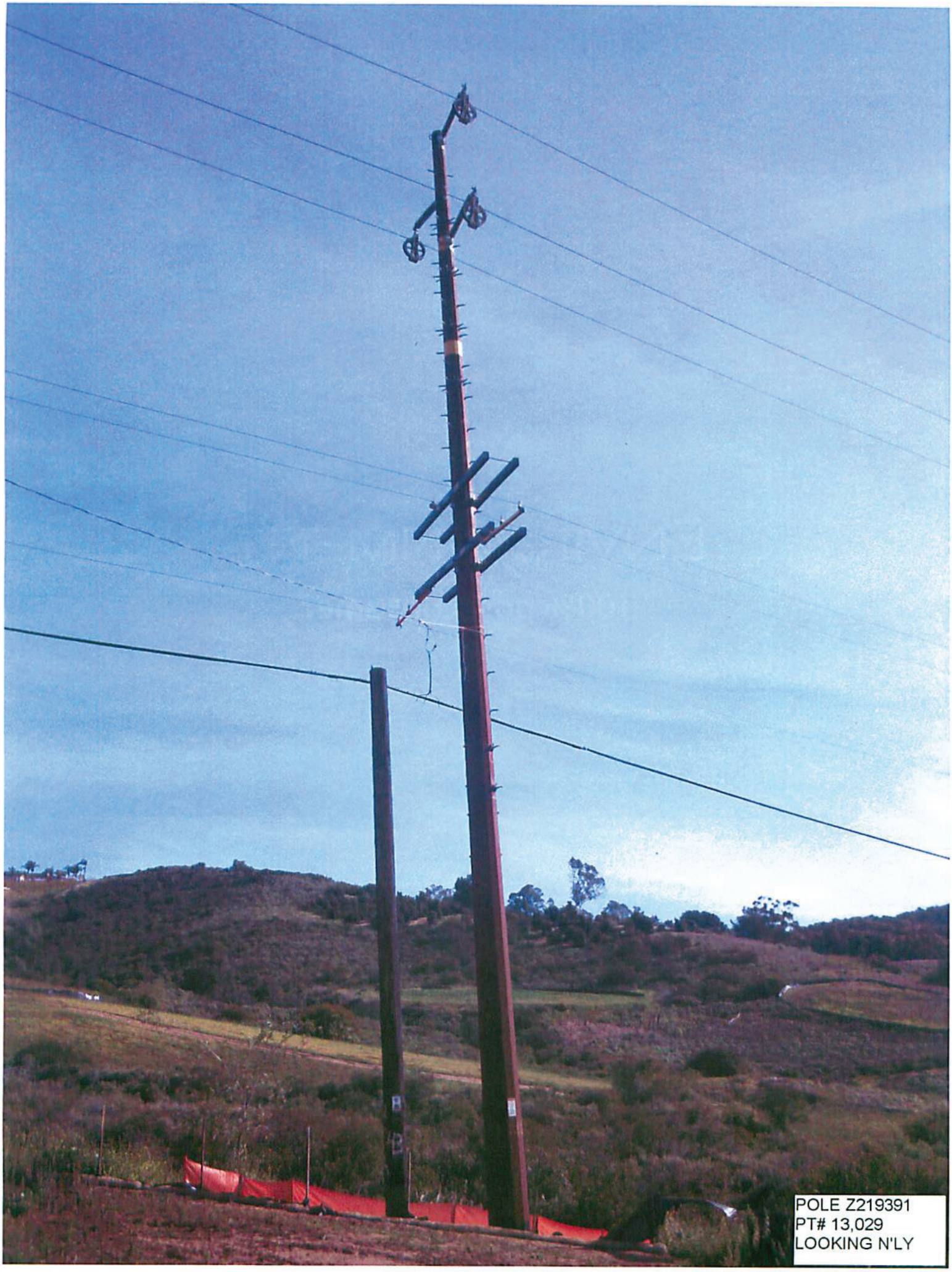


PT. NO.	DESC.	UP
	TOP OF POLE	74.7
13040	69KV POLE ARM	74.7
13314	℄ POLE @ ARM	74.7
13041	69 KV POLE ARM	70.1
13315	℄ POLE @ ARM	70.1
13042	69 KV POLE ARM	65.6
13316	℄ POLE @ ARM	65.6
13043	12 KV POLE ARM	44.2
13317	℄ 12KV ARM	44.2
13044	12KV POLE ARM	39.3
13319	℄ 12KV ARM	39.4
13045	12KV POLE ARM	39.5
13046	12 KV POLE ARM	44.1
	POLE ARM LENGTHS	
(A)	4.66' ℄ - END	
(B)	4.667' ℄ - END	
(C)	4.719' ℄ - END	
(D&E)	5.997' ℄ - END	
(F&G)	5.998' ℄ - END	
(H)	11.994' TOTAL ARM	
(I)	11.996' TOTAL ARM	
* NOTE:	GROUND ELEV. MEASURED AT	
	HIGHEST ADJACENT GRADE @	
	POLE - GROUND ELEV. AT	
	POLE MINUS 2.5 FT	

LOOKING SOUTHWESTERLY



POLE Z219391
PT# 13,029
LOOKING N'LY


POLE Z219391
PT# 13,029
LOOKING N'LY

NOLTE
BEYOND ENGINEERING

PAGE 31 OF 39

JOB NAME PALA INTERMEDIATE

JOB NO. SDP.62980D

NOTES:

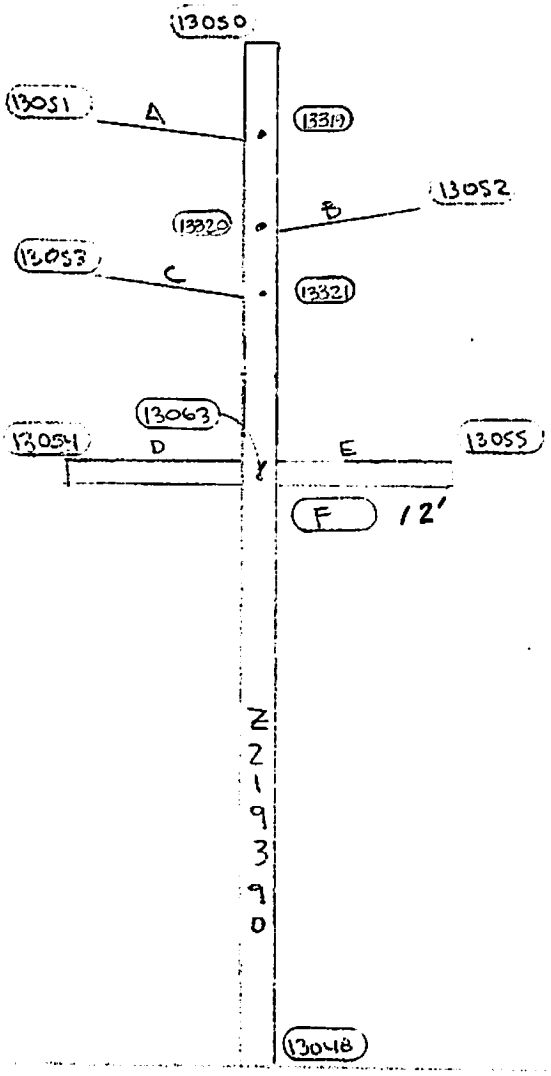
NOTE TAKER J. ALVARADO DATE 3/5/11

CHECKED BY T. LINDSAY DATE 3/7/11

STRUCTURE # Z219390

Measure Height 73.9'

Design Height 74.5'



PT. NO.	DESC.	UP
	TOP OF POLE	73.9
13051	69KV POLE ARM	72.8
13319	℄ POLE @ ARM	13.8
13052	69KV POLE ARM	69.4
13320	℄ POLE @ ARM	69.4
13053	69KV POLE ARM	64.8
13321	℄ POLE @ ARM	64.8
13054	12KV POLE ARM	48.9
13063	℄ ARM @ POLE	48.9
13055	12KV POLE ARM	48.8
→	POLE ARM LENGTHS ←	
(A)	4.620' ℄-END	
(B)	4.645' ℄-END	
(C)	4.665' ℄-END	
(D)	6.02' ℄ END	
(E)	5.97' ℄ END	
(F)	11.995' TOTAL ARM	
* NOTE:	GROUND ELEV. MEASURED AT	
	HIGHEST ADJACENT GRADE @	
	POLE - GROUND ELEV. AT	
	POLE VARIES ± 0.5 FT	

LOOKING E'LY

NOLTE: H:\SURVEY\SURVEY FORMS\SURVEY POLE UPS(SH1 2).DWG

POLE Z219390
PT# 13,048
LOOKING E'LY

SHT 32 OF 39

SHT 33 OF 39

NOLTE
BEYOND ENGINEERING

JOB NAME PALA MONSERATE

JOB NO. SDP.62915.00

NOTES:

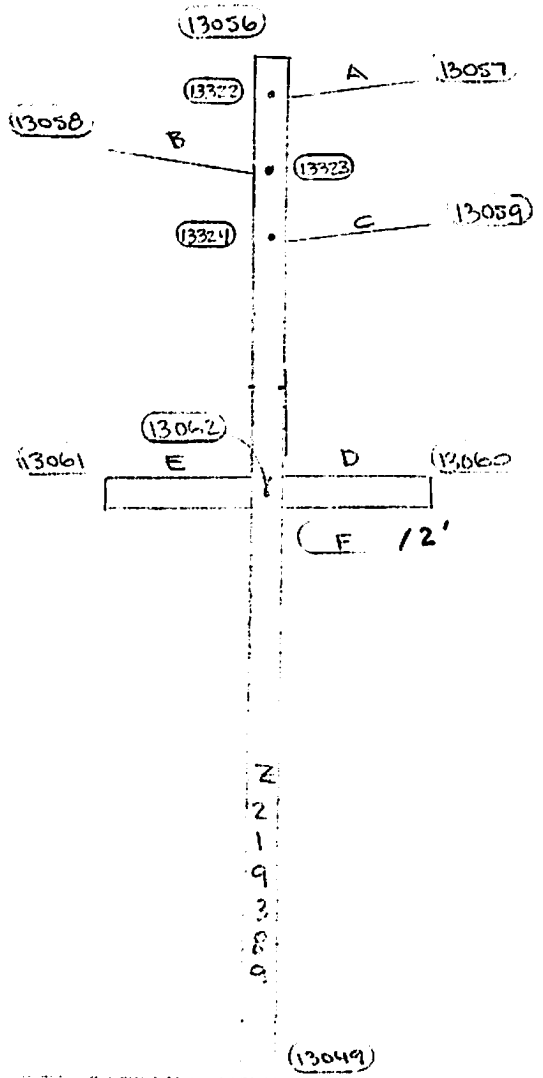
NOTE TAKER A. ALVARADO DATE 3/5/11

CHECKED BY T. Lindsay DATE 3/7/11

STRUCTURE # 2219389

Measure Height 73.9'

Design Height 74.5'



PT. NO.	DESC.	UP
	TOP OF POLE	73.9
13057	69 KV POLE ARM	73.9
13322	℄ POLE @ ARM	73.9
13058	69 KV POLE ARM	69.3
13323	℄ POLE @ ARM	69.3
13059	69 KV POLE ARM	64.9
13324	℄ POLE @ ARM	64.9
13060	12KV POLE ARM	49.2
13062	℄ ARM @ POLE	48.9
13061	12 KV POLE ARM	48.7
→	POLE ARM LENGTH	←
(A)	4.55' ℄ - END	
(B)	4.64' ℄ - END	
(C)	4.73' ℄ END	
(D)	5.935' ℄ - END	
(E)	6.005 ℄ - END	
(F)	11.99 ARM LNGTH	
*NOTE:	GROUND ELEV. MEASURED AT	
	HIGHEST ADJACENT GRADE @	
	POLE - GROUND ELEV AT POLE	
	VARIES ± 0.5 FT	

LOOKING W'LY


WARNING
HIGH VOLTAGE ABOVE KEEP OFF
TL698
Z219389
POLE Z219389
PT# 13,049
LOOKING N'LY


POLE Z219389
PT# 13,048
LOOKING E'LY

NOLTE
BEYOND ENGINEERING

JOB NAME PALA HONSEGATE

JOB NO. SDR629800

NOTES:

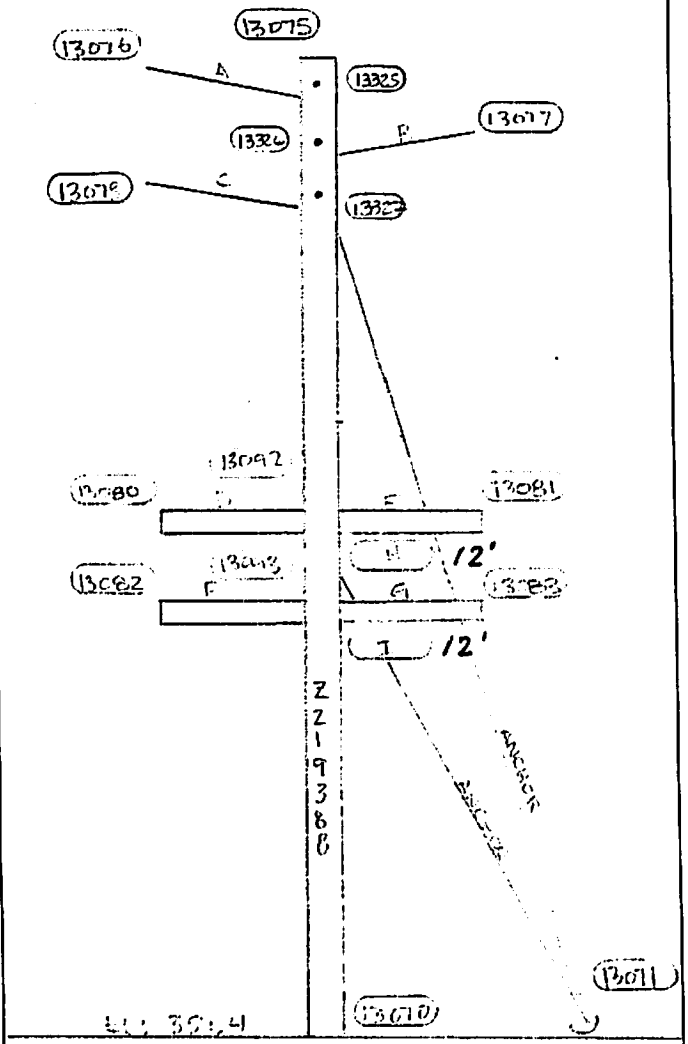
NOTE TAKER J. NAVARRO DATE 3/7/11

CHECKED BY T. [illegible] DATE 3/7/11

STRUCTURE # Z219388

Measure Height 73.2'

Design Height 74.5'



PT. NO.	DESC.	UP
	TOP OF POLE	73.2
13076	69KV POLE ARM	77.9
13325	℄ POLE @ ARM	77.9
13077	69KV POLE ARM	68.4
13326	℄ POLE @ ARM	69.4
13078	69KV POLE ARM	64.0
13327	℄ POLE @ ARM	64.0
13080	12KV POLE ARM	48.2
13092	℄ ARM @ POLE	48.2
13081	12KV POLE ARM	48.2
13093	℄ ARM @ POLE	48.2
13082	12KV POLE ARM	
13083	12 KV POLE ARM	48.2
→	ARM LENGTHS	
(A)	4.33' ℄-END	
(B)	4.37' ℄-END	
(C)	4.41' ℄-END	
(D)	5.975 ℄-END	
(E)	6.005 ℄-END	
(F&G)	.99 ℄-END	
(H)	11.985' ARM	
(I)	11.97' ARM	
* NOTE:	GROUND ELEV MEASURED AT	
	HIGHEST ADJACENT GRADE AT	
	POLE - GROUND ELEV. AT POLE	
	VARIES ± 0.5 FT	

LOOKING NORTH-EAST

NOLTE
BEYOND ENGINEERING

PAGE 38 OF 39

JOB NAME PALA LONGSPAN

JOB NO. SDE 62 9800

NOTES:

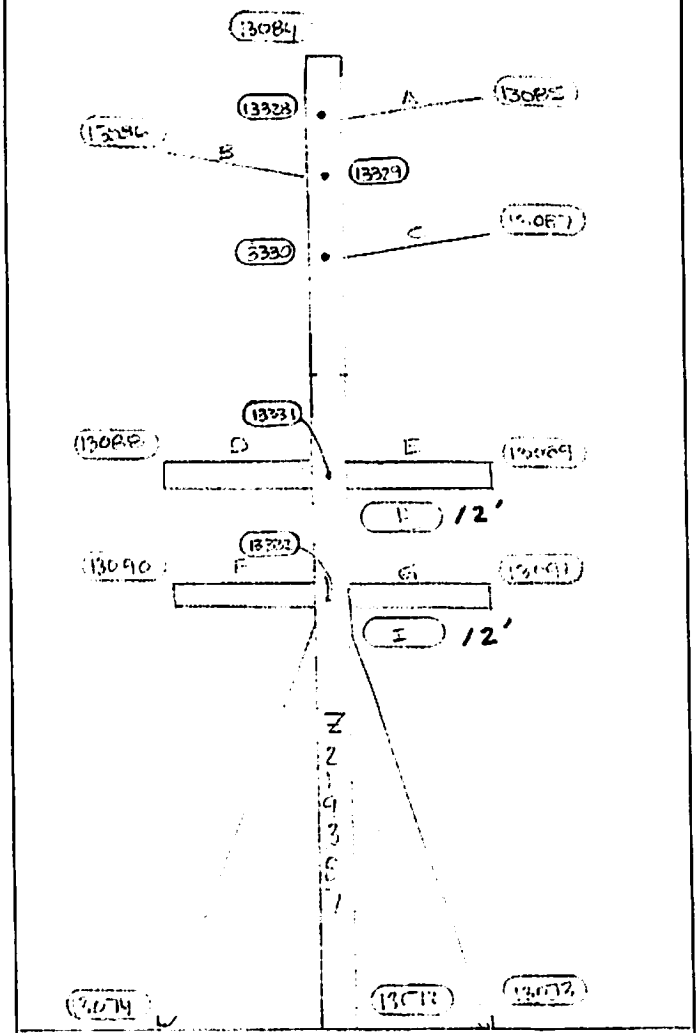
NOTE TAKER J. ALVARADO DATE 3/7/11

CHECKED BY T. LINDSAY DATE 3/7/11

STRUCTURE # 32193.87

Measure Height 83.5'

Design Height 84.0'



PT. NO.	DESC.	UP
	TOP OF POLE	83.5
13085	12KV POLE ARM	83.5
13328	℄ POLE @ ARM	83.3
13296	12KV POLE ARM	78.8
13329	℄ POLE @ ARM	78.8
13084	12KV POLE ARM	74.2
13330	℄ POLE @ ARM	74.2
13089	12KV POLE ARM	46.4
13331	℄ ARM @ POLE	46.4
13091	12KV POLE ARM	46.7
13332	℄ POLE @ ARM	42.7
13090	12KV POLE ARM	42.7
13091	12KV POLE ARM	42.4
→	ARM LENGTHS	←
(A)	4.365' ℄ END	
(B)	4.362' ℄ END	
(C)	4.36' ℄ END	
(D&E)	5.995' ℄ END	
(F&G)	5.992 ℄ END	
(H)	11.990' ARM	
(I)	11.985' ARM	
NOTE:	ALL ARMS APPEAR TO BE	
	FOR TEMPORARY USE ONLY	
	ALL THIS POLE, POLE NOT	
	[illegible]	

LOOKING NW/LN

NOLIE: N:\SURVEY\SURVEY FORMS\SURVEY POLE UPS(SHT 2).DWG

NOLTE
BEYOND ENGINEERING

PAGE 39 OF 39

JOB NAME PALA MESA RATE

JOB NO. 508.62.93.20

NOTES:

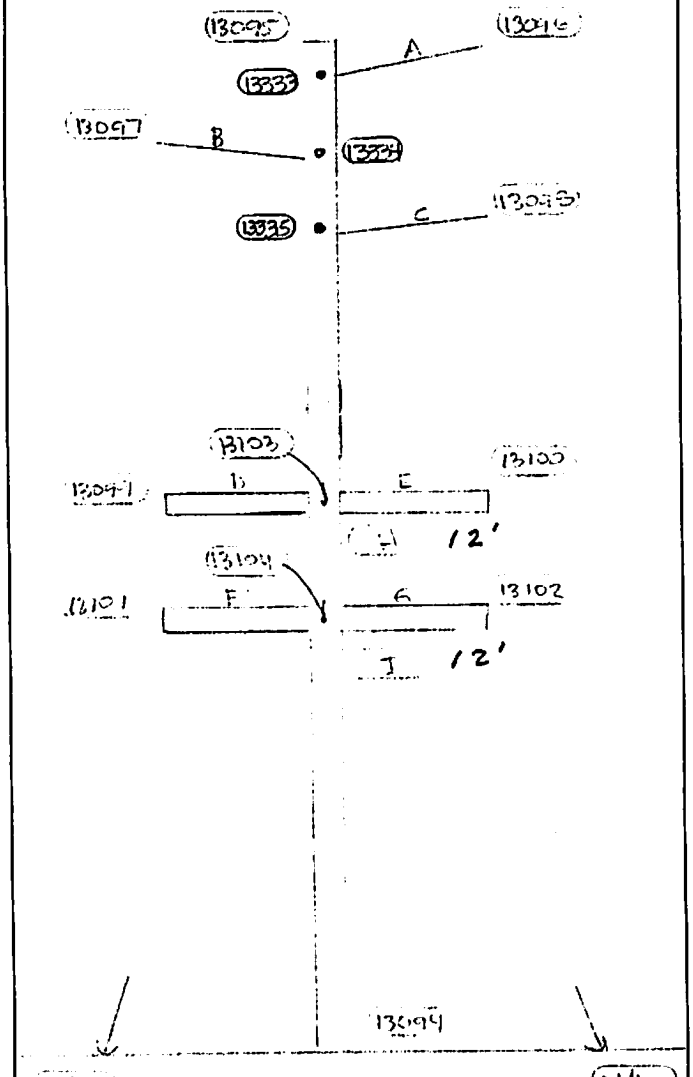
NOTE TAKER J. ALVARADO DATE 3/7/11

CHECKED BY T. Lindsay DATE 3/7/11

STRUCTURE # 221938

Measure Height 80.7'

Design Height 81.0'



PT. NO.	DESC.	UP
	TOP OF POLE	80.7
13096	69 KV POLE ARM	80.4
13333	℄ POLE @ ARM	80.4
13097	69 KV POLE ARM	75.9
13334	℄ POLE @ ARM	75.9
13098	69 KV POLE	71.3
13335	℄ POLE @ ARM	71.3
13099	12 KV POLE ARM	53.6
13103	℄ ARM @ POLE	53.6
13100	12 KV POLE ARM	53.7
13104	℄ ARM @ POLE	50.5
13101	12 KV POLE ARM	50.4
13102	12KV POLE ARM	50.5
→	ARM LENGTH	←
(A)	4.33' ℄ - END	
(B)	4.33 ℄ - END	
(C)	4.335 ℄ - END	
(D&E)	D: 5.93' / E: 6.01'	
(F&G)	F: 5.97' / G: 6.00'	
(H)	11.988' ARM	
(I)	11.968' ARM	
NOTE:	ANCHORS NOT ANALYZED	
	[illegible]	
	[illegible]	

LOOKING ----------

NOLTE: H:\SURVEY\SURVEY FORMS\SURVEY POLE UPS(SHT 2).DWG

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of the foregoing **COMPLIANCE AFFIDAVIT OF SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E)** on all parties of record to proceeding number C.11-02-009 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission.

Copies were also sent via Federal Express to Administrative Law Judge Karl J. Bemesderfer and Commissioner Timothy Alan Simon.

Executed this 18th day of March, 2011, at San Diego, California.

/s/ Jenny Norin
Jenny Norin

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: C1102009 - LEATHERBURY & LOWELL
FILER: LEATHERBURY & LOWELL FAMILY TRUSTS
LIST NAME: LIST
LAST CHANGED: MARCH 2, 2011

DOWNLOAD THE COMMA-DELIMITED FILE
ABOUT COMMA-DELIMITED FILES

Back to Service Lists Index

Parties

CHUCK LEATHERBURY
LEATHERBURY & LOWELL FAMILY TRUSTS
2848 VIA VICTORIA
PALOS VERDES ESTATES, CA 90274
FOR: LEATHERBURY & LOWELL FAMILY TRUSTS

MEGAN CAULSON
TARRIFF MGR.
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1548
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

Information Only

CALIFORNIA ENERGY MARKETS
425 DIVISADERO STREET, SUITE 303
SAN FRANCISCO, CA 94117

State Service

KARL BEMESDERFER
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5006
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS