

**ENVIRONMENTAL EVALUATION
FOR PROPOSED EASEMENT AND NEW RIGHT-OF-WAY FOR ELECTRIC
FACILITIES FOR THE STRATEGIC UNDERGROUNDING PROGRAM
CIRCUIT 1030 SECTION 3B PROJECT (TRIBAL TRACTS T-5010, T-5011)**

**eTS 4955001, SR No. 479033, Job Notification No. 300000414458,
Project No. 3-414133**

**San Pasqual Band of Diegueño Mission Indians
Valley Center, California
May 31, 2024**

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Introduction: As part of the Strategic Undergrounding Program (SUG), SDG&E proposes to obtain a new easement for a right-of-way (ROW) to install, own, operate, maintain, repair, replace, reinstall, reconstruct, and/or remove electrical facilities that would provide electrical service to tribal residences and reduce wildfire risks and Public Safety Power Shutoffs (PSPSs) on part of Circuit (C) 1030 within the San Pasqual Band of Diegueño Mission Indians (San Pasqual) Reservation. The requested ROW easement for the C1030 3B Project (Project) would be approximately 6.58 miles long and 30 feet wide. The Project proposes to install underground electric facilities consisting of conduit, cable, and pad-mounted and subsurface electrical equipment within paved roads and adjacent road shoulders on the San Pasqual Reservation.

The proposed ROW easement would include operations and maintenance (O&M) activities on the new alignment and other associated facilities. The duration of the easement would be indefinite and without a term of years.

Location: The Project is located in northern San Diego County within the San Pasqual Reservation along Aasha Court, Canal Road, Eagle Way, East Canal Road, Eshash Road, Geronimo Pass, Grace Lane, Kuttap Way, Linuyp Way, Netaat Way, Oos Place, Oos Road, Peart Road, Tokama Lane, Vasquez Way, West Canal Road, and Wolf Heart Ranch Way, as well as on private driveways. An overview of the Project area is provided in Attachment 1: General Site Map.

Affected Environment: The Project area consists of several 30-foot-wide areas of varying lengths within paved roads, adjacent road shoulders, and private driveways, as well as existing distribution poles located within native habitat, landscaped vegetation, disturbed habitat, bare ground, and developed access roads. Representative photographs

of the Project area are provided in Attachment 2: Project Site Photographs. Project area locations are shown in Attachment 3: Location Information for Project Site(s).¹

The Project area is characterized by steep topography that consists of scenic steep hillsides, canyons, and ridgelines situated adjacent to the flat topography of the valley. The elevation ranges from approximately 1,640 feet above mean sea level (MSL) to approximately 1,930 feet above MSL. The southern portion of the Project area is located in the HUC12-Moosa Canyon watershed, while the northern portion of the Project area is located within the HUC12-Paradise Creek-San Luis Rey River watershed.

Information regarding the soil types and characteristics occurring in the Project area was obtained from the Natural Resources Conservation Service Soil Survey Geographic Database, which provides detailed information for natural resource planning and management. The most prevalent soil types in the Project area consist of Fallbrook-Vista sandy loam, Fallbrook sandy loam, and Visalia sandy loam soils. These soils, as well as the remaining soil types in the Project area, are well-drained and non-hydric (U.S. Department of Agriculture 2024).

According to the California Geological Survey, the geologic unit that underlies the Project area is grMz, which is a plutonic rock unit of Mesozoic age that includes batholithic granite, quartz monzonite, granodiorite, and quartz diorite (California Department of Conservation 2022). An official species list was acquired from the United States (U.S.) Department of the Interior Fish and Wildlife Service (USDOI-FWS) via the Information for Planning and Conservation website (USDOI-FWS 2024). Official species lists include any threatened, endangered, or proposed species managed by the USDOI-FWS with the potential to occur within a Project area based on the known or expected range of each species. The California Natural Diversity Database was also queried for any records for any federally listed or proposed species that may have the potential to occur within 1 mile of the Project area (California Department of Fish and Wildlife [CDFW] 2024). The results, as presented in Attachment 5: Biological Evaluation, highlighted seven species with ranges that overlap the Project area: arroyo toad (*Anaxyrus californicus*), coastal California gnatcatcher (*Polioptila californica californica*), least Bell's vireo (*Vireo bellii pusillus*), southwestern pond turtle (*Actinemys pallida*), southwestern willow flycatcher (*Empidonax traillii extimus*), Stephens' kangaroo rat (*Dipodomys stephensi*), and western spadefoot (*Spea hammondi*).

No critical or suitable habitat for these species occurs in the Project area. The Project is located in a rural residential developed area. The underground conduit associated with the Project would be installed in roads and roadside easements, thus avoiding pristine, naturally vegetated areas.

Project Objectives: SDG&E is requesting a new easement for a 30-foot-wide ROW to install, own, operate, maintain, repair, replace, reinstall, reconstruct, and/or remove

¹ Due to projection issues with the Bureau of Indian Affairs (BIA) boundary layer, which was sourced from the BIA's website (BIA 2024), some poles and portions of the proposed ROW may appear to occur off BIA land. For the final easement, please refer to the Survey Plat.

electric facilities within the Project area. The proposed ROW would also expressly provide SDG&E the right to install, own, operate, maintain, repair, replace, reinstall, reconstruct, and/or remove communication facilities used solely and exclusively for SDG&E's overall mission of SUG.

Alternatives:

- 1. Alternative 1 (No Action Alternative).** Under the No Action Alternative, the Bureau of Indian Affairs (BIA) would not grant SDG&E's request for an easement for a new ROW that is required to install, own, operate, and maintain, repair, replace, reinstall, reconstruct, and/or remove the electric facilities that would provide enhanced wildfire resiliency and electric reliability on tribal lands.
- 2. Alternative 2 (Preferred Alternative).** The Preferred Alternative would be to grant SDG&E's request for an easement for a new ROW to install, own, operate, and maintain underground electric-cabled conduit within approximately 6.58 miles of paved roads and adjacent road shoulders within the San Pasqual Reservation in the unincorporated community of Valley Center, California. Eighty-eight existing poles with existing easements within the Project area would be relinquished by SDG&E under the Preferred Alternative. Table 1: Pole List shows the action that would be taken at each pole within the Project area and the associated easement action that would be taken.

Table 1: Pole List

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P116431J	4	11	Relinquished Easement/APE	Top at Communications	189-060-24	5893782062	148870
P116432	4	12	Relinquished Easement/APE	Top at Communications	189-060-24	5893782062	148870
P116433	4	13	Relinquished Easement/APE	Top at Communications	189-060-24	5893782062	148870
P117993	2	14	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1311	150322
P130991	4	15	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-1102	139771
P136552	1	16	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1096	142276
P136553	1	17	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1096	142276
P136554	1	18	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1096	142276
P136557	4	19	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1103	139770
P136558	7	20	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1103	139770
P136559	7	21	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1103	139770
P136560	4	22	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1102	139771

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P136616	8	23	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1098	139774
P136617	8	24	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1098	139774
P136618	8	25	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1098	139774
P136648	2	26	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1106	139814
P136658	3	27	Relinquished Easement/APE	Remove-from-service (RFS) Pole	189-060-24	378-SAN PASQUAL-1099	139773
P137575	3	28	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-181-15	378-SAN PASQUAL-1101	139816
P137788	3	29	Relinquished Easement/APE	Top at Communications, RFS Anchor	189-181-15	378-SAN PASQUAL-1109	140906
P137789	3	30	Relinquished Easement/APE	Top at Communications, RFS Anchor	189-181-15	378-SAN PASQUAL-1130	140907
P160090	2	31	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1106	--
P160746J	5	32	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-615	118475
P161681	3	33	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1911	163874
P166566	3	34	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1755	158464
P169573	7	35	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1512	154727

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P169574	7	36	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1512	154727
P194447	8	37	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-080-27	378-SAN PASQUAL-1717	157944
P202478	2	38	Relinquished Easement/APE	Top at Communications, RFS Riser	189-181-15	378-SAN PASQUAL-1832	160489
P202483	6	39	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1843	161541
P202484	5	40	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1843	161541
P202485	5	41	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1843	161541
P203835J	7	42	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-1929	162823
P216806	2	43	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1907	163869
P216807	2	44	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1907	163869
P216808	1	45	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1907	163869
P219319	6	46	Relinquished Easement/APE	RFS Pole	189-080-27	5893782021	165666
P219322	5	47	Relinquished Easement/APE	RFS Pole, RFS Anchors (2)	189-080-27	5893782021	165666
P219329	5	48	Relinquished Easement/APE	Top at Communications	189-080-27	5893782021	165666

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P219330	6	49	Relinquished Easement/APE	RFS Pole	189-080-27	5893782021	165666
P219331	6	50	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-080-27	5893782021	165666
P228151	4	51	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-409	78014
P233435	3	52	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-1131	140914
P233708	3	53	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1755	158464
P246184	6	54	Relinquished Easement/APE	RFS Pole	189-080-27	5893782043	166265
P32544	5	55	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-1016	132396
P32545	5	56	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1016	132396
P617891	3	57	Relinquished Easement/APE	RFS Pole, RFS Anchors (2)	189-060-24	378-SAN PASQUAL-409	78014
P617892	3	58	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-409	78014
P617893	3	59	Relinquished Easement/APE	RFS Pole	189-060-24	378-SAN PASQUAL-409	78014
P617894	4	60	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-409	78014
P617895	4	61	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-409	78014

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P617896	4	62	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-409	78014
P617897	4	63	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-409	78014
P617999	4	64	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-409	78014
P711612	4	65	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-1103	139770
P714322	4	66	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-674	102736
P714323	4	67	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-674	102736
P714324	4	68	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-674	102736
P715096	3	69	Relinquished Easement/APE	Top at Communications, RFS Anchor	189-060-24	378-SAN PASQUAL-1101	139816
P717150	4	70	Relinquished Easement/APE	Top at Communications	189-060-24	--	114531
P717151	4	71	Relinquished Easement/APE	Top at Comm, RFS Anchor	189-060-24	--	114531
P717152	4	72	Relinquished Easement/APE	Top at Communications	189-060-24	--	114531
P718845	2	73	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1311	150322
P718846	2	74	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1311	150322

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P810044	2	75	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-748	113075
P810045	3	76	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-748	113075
P810046	3	77	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-748	113075
P811510	5	78	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-764	117181
P811511	5	79	Relinquished Easement/APE	Top at Comm, RFS Anchors (2)	189-060-24	378-SAN PASQUAL-764	117181
P812240	3	80	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-1862	160703
P812871	4	81	Relinquished Easement/APE	Top at Communications	189-060-24	--	--
P812983	5	32	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-615	118475
P813728	2	82	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-802	119372
P814689	4	83	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-1099	139773
P814690	4	84	Relinquished Easement/APE	RFS Pole, RFS Anchor	189-060-24	378-SAN PASQUAL-1099	139773
P816336	3	85	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-1103	139770
P816337	3	86	Relinquished Easement/APE	RFS Pole	189-060-24	378-SAN PASQUAL-1103	139770

Facility ID	Map Page #	Photo Doc #	Easement Action	Proposed Scope	Assessor's Parcel Number	BIA RW #	SDG&E RW #
P816338	4	87	Relinquished Easement/APE	Top at Communications	189-080-27	378-SAN PASQUAL-1103	139770
P817030	2	88	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-943	126561
P817031	2	89	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-943	126561
P817032	2	90	Relinquished Easement/APE	Top at Communications	189-181-15	378-SAN PASQUAL-943	126561
P817062	8	91	Relinquished Easement/APE	RFS Pole	189-080-27	378-PALA-171	125039
P817063	8	92	Relinquished Easement/APE	Top at Communications	189-080-27	378-PALA-171	125039
P817064	8	93	Relinquished Easement/APE	Top at Communications	189-080-27	378-PALA-171	125039
P817065	8	94	Relinquished Easement/APE	Top at Communications	189-080-27	378-PALA-171	125039
P817081	4	95	Relinquished Easement/APE	Top at Communications	189-060-24	378-SAN PASQUAL-941	125798
P817481	3	96	Relinquished Easement/APE	RFS Pole	189-181-15	378-SAN PASQUAL-1101	139816
P818772	3	97	Relinquished Easement/APE	RFS Pole	189-060-24	--	--

The designed underground conduit packages vary from 12 to 18 inches in width. Trench excavations are up to 2.5 feet wide and up to eight feet deep. Proposed structures within the easement area include 73 handholes, 38 transformers, and nine terminators. The handholes would be installed below ground up to 6.5 feet in depth.

Paved areas that are disturbed by trenching would be returned to pre-existing conditions after Project construction is complete. Civil contractors would perform trench and structure excavations and electrical contractors would perform the electrical/conduit and overhead (OH) work.

Access to Project locations would be provided by existing paved or dirt access roads, and by footpaths with a maximum width of three feet. Construction work areas are expected to use one lane of the roadway and adjacent paved areas, as well as bare ground or disturbed road shoulders. An encroachment permit would be obtained from the County for the proposed construction activities and submitted to the BIA upon issuance. Typical traffic control setups would include light/arrow boards, flagging operations to restrict traffic to one direction at a time around the work area, and signage and cones to safely divert traffic around the work area. Flaggers would be used intermittently to manage intersections and accommodate traffic and construction equipment. When construction is not occurring, the roadways would be cleared of all equipment, open trenches would be covered with steel plates, and both lanes of traffic would be open. Excavated materials would be hauled off site (i.e., to a staging yard) at the end of each workday (if needed), and all equipment, materials, and vehicles would be moved to a staging yard at the end of each workday.

No staging or construction yards would occur on BIA lands for this Project. The Woods Valley Staging Yard, which is located on private land, is expected to be utilized for work on this Project. The Woods Valley Staging Yard is an existing developed yard that was previously used for SDG&E projects.

The Project start date is subject to Project approval, and construction would last approximately 26 weeks. Construction work hours would be approximately 7:00 a.m. to 7:00 p.m., five to six days a week, or as required by permits. Staffing for construction would include two concurrent work crews, including civil and electric contractors, as well as SDG&E environmental field monitors. A work crew of four to six people may be staffed by operators (e.g., asphalt/concrete cutters, vacuum truck, and heavy equipment), drivers, welders, inspectors, foremen, electric troublemen, supervisors, hand-digging crews, and traffic control flaggers. On-site vehicles would include an asphalt/concrete cutter truck, vacuum truck, backhoe, track hoe, Bobcat®, excavator, dump truck, support truck, water truck, utility trucks, crew trucks, hauling trailer, loader for 18-inch (and larger) trenches, flatbed trucks, traffic control trucks, and one or two pickup trucks for the environmental field monitors. All vehicles would carry the required SDG&E fire safety equipment (i.e., fire extinguisher, fire pump, Pulaski fire axe, shovel, and wheel chocks). Field equipment/materials may include conduit, slurry backfill, compaction equipment, saw-cut vacuum,

jackhammers, plates, hand tools, wheelbarrow, stormwater protection best management practices (BMPs), and traffic control equipment and materials.

Operation and Maintenance (O&M) activities are those related to the control and upkeep of existing SDG&E facilities, including but not limited to routine, preventive, scheduled, and unscheduled actions aimed at preventing equipment failure or decline with the goal of maintaining or increasing efficiency, reliability, and safety. O&M activities include inspecting, monitoring, and testing existing equipment; operating valves and switches; repairing and replacing existing facilities, structures, wires, and access roads; increasing the height above ground or the depth below ground of facilities; replacing overhead lines with buried underground lines; and vegetation management, including tree removal and pruning. The easement also includes the right of SDG&E to ingress and egress to, from, along, and within the easement by a practical route or routes in, upon, over, and across the San Pasqual Reservation. The easement would also require the area to be kept clear of structures, including but not limited to buildings, explosives, brush, combustibles and materials, and allows the construction and maintenance of roads as are necessary and appropriate.

SDG&E regularly inspects facilities, including those that are part of the preferred alternative, to determine O&M requirements. If O&M requirements are identified during inspections, SDG&E crews or contractors conduct the required maintenance. This typically includes utilizing a five-person crew consisting of an aerial lift and two to three four-wheel-drive crew trucks. The potential O&M activities include, but are not limited to, equipment repair and replacement, such as conductors (wires) and insulators, poles and crossarms, communications equipment, vegetation management, such as tree trimming or removing flammable materials, transmission road regrading and erosional repairs, and driving vehicles to and from existing poles and facilities. Vehicle access and work areas for O&M activities would be located in the same areas as described above for construction activities.

Vegetation management plays a critical role in maintaining reliable and safe gas and electrical service throughout the region. Vegetation is managed within and adjacent to all SDG&E facilities including but not limited to overhead electric lines, substations and regulators, access roads, drainage structures, areas around transformers, and buildings. Vegetation is controlled to facilitate the construction and use of roads, allow inspection and maintenance of infrastructure and facilities, expose hazards such as ruts to drivers, eliminate noxious weeds, prevent fires, and provide safe working areas.

SDG&E conducts ongoing vegetation removal and management around electric and gas infrastructure in order to comply with California Public Utilities Commission General Orders, Public Resources Code Section 4292, and other applicable laws for fire prevention or control. These fire control measures can aid in the prevention of fire caused by arcing and can protect the facilities from failure due to a fire in a surrounding area. Areas cleared of vegetation are also required around gas line valve complexes and cathodic test stations for fire protection.

The environmental impacts of the preferred alternative are described in the Potential Effects to Environment section.

Consequences of Selected Alternative:

1. **No Action:** As indicated previously, the Project objectives as part of SUG would not be met. SDG&E would continue to operate its existing distribution lines but doing so would not reduce the risk of catastrophic wildfire and impacts of PSPSs during extreme weather conditions.
2. **Preferred Alternative:** SDG&E selected the actions proposed in the preferred alternative as they would meet both SUG and Project objectives without substantially adding environmental impacts, as described in the following sections.

Potential Effects to Environment:

1. **Land Resources:** Approximately 6.58 miles of proposed new underground electric-cabled conduit would be installed within the San Pasqual Reservation. These components would be installed along Aasha Court, Canal Road, Eagle Way, East Canal Road, Eshash Road, Geronimo Pass, Grace Lane, Kuttap Way, Linuyp Way, Netaat Way, Oos Place, Oos Road, Peart Road, Tokama Lane, Vasquez Way, West Canal Road, and Wolf Heart Ranch Waye.

The Project does not cross any special land uses that have additional management considerations or protections (e.g., conservation areas, historic/scenic trails, recreation areas). No underground storage tanks and no Resource Conservation and Recovery Act sites were identified within the vicinity of the Project area. If solid waste and hazardous waste is inadvertently generated, the proper authorities would be consulted regarding disposal of such waste.

2. **Water Resources:** The designed conduit packages vary from 12 to 18 inches in width; therefore, to accommodate them, trench excavations are anticipated to be up to 2.5 feet wide and up to eight feet deep. No significant impacts to ground water resources are anticipated because most construction and installation would be limited to the roadside ROW on previously disturbed land. In addition, construction trenching would not be deep enough to affect ground water resources. No aquifers or other ground water resources have been identified. The Project would be enrolled in a comprehensive Storm Water Pollution Prevention Plan (SWPPP). All BMPs would be implemented per the SWPPP and SDG&E BMP Manual.

Eighteen ephemeral or intermittent drainages traverse the Project area and would be crossed by the Project in four locations. The waters traverse the Project via

culverts or are located under existing spans of overhead conductor. No impacts to water resources are anticipated.

3. **Biological Resources:** All O&M activities on BIA-regulated lands are conducted in accordance with SDG&E's 2023 Habitat Conservation Plan (HCP) Amendment, which was approved by USDO-I-FWS and ensures compliance with Section 10 of the Endangered Species Act (ESA). The HCP Amendment authorizes the "incidental take of 41 species in San Diego County and portions of Orange and Riverside County." The incidental take permit (ITP) is in effect and provides take authorization for all ESA-listed species on BIA land and in SDG&E's service territory.

The HCP Amendment ensures a continuation of SDG&E's efforts to avoid and minimize impacts to numerous wildlife and plant species and their habitats, while allowing SDG&E to install, maintain, operate, and repair its existing system and undertake typical expansion of the electric grid. It includes dozens of required operational protocols, including species-specific and vernal pool protocols.

SDG&E would continue to operate and maintain existing facilities in an environmentally sensitive manner by complying with its ITP and following a number of other best management practices and other standard operating procedures that have been developed and implemented by SDG&E over the past 28 years to avoid and minimize environmental impacts, and to comply with applicable environmental laws and regulations.

- A. **Wildlife:** Attachment 5: Biological Evaluation contains a list of species that are USDO-I-FWS federally listed as Threatened or Endangered, or proposed for listing, as well as describes whether those species have the potential to occur within the Project area. None of the species listed were determined to occur within the Project area; therefore, no impacts are anticipated to identified wildlife species.

No USDO-I-FWS designated critical habitat occurs within the Project area.

- B. **Vegetation:** Native habitats observed within the vicinity of the Project area include coastal sage scrub, chaparral, coast live oak forest, and riparian forest habitats. The proposed alignment and Project structures would have limited impact on native vegetation communities, as most work would remain within the road, road shoulders, disturbed habitat, and/or landscaped vegetation. A total of approximately 68,272 square feet of temporary impacts would occur within previously disturbed non-native habitat or landscaped vegetation due to the installation of underground conduit and structures. A total of approximately 962 square feet of permanent impacts would occur within previously disturbed non-native habitat or landscaped vegetation due to the installation of underground structures.

Regarding OH facilities, 10 OH pole sites occur within native habitat; however, the RFS activities and pole-top work at these sites would result in no measurable impacts to native habitat as defined by the HCP Amendment. A Pre-activity Survey Report would be prepared and submitted to the USDO-I-FWS per the requirements of the HCP Amendment.

Due to the siting of the Project mostly in disturbed habitat or landscaped vegetation and no measurable impacts resulting from activities within native habitat, no impacts are anticipated to vegetation.

- C. **Ecosystems and Biological Communities:** No impacts are anticipated to ecosystems or biological communities. The installation of underground electric-cabled conduit would be sited within paved roads and adjacent road shoulders, which are predominantly pavement, disturbed habitat, or bare ground. Adjacent lands are predominantly semi-rural residential and rural land where landscaped/ornamental habitat is present. This habitat consists of many non-native species and the habitat is routinely mowed or maintained for aesthetic purposes. Native vegetation communities that occur in the Project area primarily occur under spans or adjacent to workspaces where no impacts are anticipated. Due to the siting of the Project and current land use in the Project area, no impacts are anticipated to ecosystems and biological communities.
- D. **Agriculture:** Due to the lack of agricultural land within the Project area, no impacts are anticipated to livestock, agricultural crops, or unique or prime farmland.
4. **Cultural Resources:** As this area had not been previously surveyed, SDG&E requested and received permission from Chairman Cope to conduct a records search and survey of the Project area. A confidential cultural resources survey was conducted by ASM Affiliates, Inc. (ASM) under ARPA permit BIA/PRO-20-02-J54(577). The survey report was submitted and reviewed by the San Pasqual Tribal Historic Preservation Officer (THPO) and submitted to BIA cultural staff on December 21, 2021. Based on the survey report, eight cultural resources cannot be avoided through Project design (Jordan 2021). Therefore, testing is required. A confidential testing plan was prepared in coordination with the THPO and was submitted to BIA cultural staff with ARPA permit application by ASM on October 26, 2022 (Williams 2022). Upon approval, testing commenced in March of 2023 through August of 2023 along the Project alignment that is not currently capped by paved roads. The remainder of the testing effort will be conducted just prior to construction. Based on the preliminary testing results, the majority of the area has been previously disturbed by recent or past construction in the Project area and no intact deposits were observed (Jordan 2024). The testing report will be updated and finalized once the remainder of the testing effort is completed. However, based on the preliminary results, no additional evaluation efforts are recommended, and no impacts to cultural resources are

anticipated. Monitoring during construction of the new underground and pole work by an archaeological monitor and Native American monitor is recommended.

All cultural reports are confidential and have been delivered directly to the BIA archaeologist.

During all phases of the Project, SDG&E and ASM have consulted and coordinated with Desiree Morales, the THPO; Angelina Gutierrez, the THPO Monitoring Supervisor; Chairman Cope; and Harold “Dan” Hall, BIA Regional Archaeologist.

5. **Sensitive Area Resources:** The Project is located in a low-density residential developed area with previously disturbed roadside vegetation. No sensitive resources were identified; therefore, impacts to sensitive area resources will be avoided.
- **Air Resources:** The Project would not result in permanent air quality impacts, but some minor air emissions related to construction and O&M activities (e.g., equipment operation) could occur. Construction activities would be limited to the construction period (i.e., 6 months) and O&M activities would occur intermittently and for short durations. In addition, California Air Resources Board (CARB) requirements applicable to off-road diesel equipment, portable diesel engines with a rating of 50 horsepower or greater, and diesel-fueled commercial motor vehicle idling, as well as San Diego Air Pollution Control District (SDAPCD) requirements for visible emissions, nuisance emissions, and fugitive dust control, would be implemented (CARB 2018a, 2018b, 2021; SDAPCD 1976, 1997, 2009). Therefore, any air quality impacts would be temporary and would not result in long-term air quality impacts.

Recommendation: Based on the objectives of the Project, which are to underground distribution lines for operational and safety reasons as previously described, implementation of the No Action Alternative is not recommended.

The Project makes substantial use of existing roads and previously disturbed land to minimize impacts to the environment. In addition, potential environmental impacts would be minimized as described in this evaluation. Therefore, recommendation of the proposed action is the Preferred Alternative.

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Attachments

Attachment 1: General Site Map

Attachment 2: Project Site Photographs

Attachment 3: Location Information for Project Site(s)

Attachment 4: Cultural/Historical Properties Determination

Attachment 5: Biological Evaluation

Attachment 6: Environmental Overview Form

Attachment 7: NEPAssist Report