

# CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS



# A Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM

| <b>Date Submitted:</b>   | 10-16-17               |           | Request #:        |             | 010       |            |            |
|--|------------------------|-----------|-------------------|-------------|-----------|------------|------------|
| Date Approval Required:  | 10-30-17               |           | Landowner:        |             | United St | ates Fores | st Service |
| APN:   | XXX-XXX-XX and X       | XXX-XX    | XX-XX             |             |           |            |            |
| Refinement from (check all   | that apply):           |           |                   |             |           |            |            |
| ☐ Mitigation Measure   | $\square$ APM          | ⊠ Pro     | ject Description  | $\boxtimes$ | Drawing   |            | Other      |
| Identify source (mitigation measure, project description, etc.):   |                        |           |                   |             |           |            |            |
| In April 2015, San Diego Gas & Electric Company's (SDG&E's) responses to Data Request #10 were submitted to the California Public Utilities Commission (CPUC). The responses included Attachment B.6 C78 Route Map for the Cleveland National Forest Power Line Replacement Projects (Project). Pages B-18 and B-19 of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) describe the components of Circuit (C) 78, and page B-45 describes the Project's temporary workspace requirements for staging areas and pole work areas. The information in this Minor Project Refinement (MPR) request form discusses the addition of one new staging area and the shift of Pole P257776 to a new location approximately 50 feet east of the location that was approved in Notice to Proceed (NTP) #7 (see Map 1 of 4 of Attachment A: NTP #7 Components Map for the original location). A brief description and justification of the refinements are provided on page 2 of this MPR request. |                        |           |                   |             |           |            |            |
| Attachments (check all that  | apply):                |           |                   |             |           |            |            |
| ⊠ Refinement Request       Screening Form       ⊠ Photos (See       ⊠ Maps (See         (see Attachment A: Minor       Attachment C:       Attachment B: Survey         Project Refinement Request       Photographs)       Area Map)         Screening Form)       Screening Form)  |                        |           |                   | ☐ Other     |           |            |            |
| Under Order 2 of the Decis<br>Line Replacement Projects<br>circumstances. In accordan<br>(a) through (d).  | (D.16-05-038), the CF  | PUC may   | approve minor p   | roject      | refinemen | ts under o | ertain     |
| (a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area?  The requested refinements are located within the geographic boundary of the Final EIR/EIS study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. The requested staging area occurs outside of the baseline survey area while the temporary pole work area is located within the baseline survey area. As a result, supplemental hydrology, biological, and cultural resources surveys were conducted in 2017. Additional details regarding the specific surveys conducted can be found in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form, and the boundaries of the 2017 survey areas are depicted in Attachment B: Survey Area Map.   |                        |           |                   |             | □ Yes     | ⊠ No       |            |
| (b) Will the proposed refine increase in the severity of a used in the EIR/EIS?  |                        |           |                   |             |           | □ Yes      | ⊠ No       |
| (c) Does the proposed refine or policy?  | ement conflict with an | ny mitiga | tion measure or a | pplical     | ole law   | □ Yes      | ⊠ No       |

| (d) Does the proposed refinen  | nent trigger an additi   | onal permit requirer                               | nent?              |         | □ Yes                   | ⊠ No     |  |
|--|--|--|--------------------|---------|-------------------------|----------|--|
| Describe refinement being requested (attach drawings and photos as needed):  |  |  |                    |         |                         |          |  |
| As depicted in Attachment B: Survey Area Map and Attachment C: Photographs of this MPR request, SDG&E proposes to add a staging area just north of the eastern terminus of the C78 alignment and shift Pole P257776 approximately 50 feet east of its approved location to the eastern side of Red Oak Road. The temporary pole work area associated with Pole P257776 will also move approximately 50 feet southeast, but will remain approximately the same size and configuration. The requested staging area is located approximately 309 feet north of Pole P172713 and will be accessed using an existing, approved navigation road. Mowing will be required for use of the staging area, which is approximately 0.23 acre of non-native grassland. The staging area will be used for approximately two months. The activities associated with the construction and utilization of the refinement areas will be consistent with the project description as detailed in the Final EIR/EIS.  The requested refinements will result in an increase of up to 0.24 acre of temporary impacts, of which approximately 0.01 acre is classified as Southern Mixed Chaparral. |  |  |                    |         |                         |          |  |
| Provide need for refinement  | attach drawings and  | photos as needed):                                 |                    |         |                         |          |  |
| The staging area is being requested to provide an additional area for vehicle parking and turnaround, as well as additional storage for materials and equipment adjacent to the Project's right-of-way (ROW). Because the C78 Fly Yard, which was previously approved in MPR #5, is no longer available due to its change in ownership, the additional staging area is needed. The staging area was selected due to its accessibility from an existing, approved navigation road, as well as its minimal slope and current vegetation cover (i.e., predominantly non-native grasses).  SDG&E is requesting to shift Pole P257776 per the landowner's request. The location for Pole P257776, as  |  |  |                    |         |                         |          |  |
| SDG&E is requesting to shift P   | ole P257776 per the la   | ndowner's request. T                               | he location for F  | Pole P2 |                         |          |  |
| SDG&E is requesting to shift P<br>depicted in NTP #7, will limit t<br>Moving the pole across Red Oa  | he landowner's current   | t use and utilization of                           | f the existing acc | ess ro  | 257776, as<br>ad/drivew | s<br>ay. |  |
| depicted in NTP #7, will limit t   | he landowner's current   | t use and utilization of                           | f the existing acc | ess ro  | 257776, as<br>ad/drivew | s<br>ay. |  |
| depicted in NTP #7, will limit t<br>Moving the pole across Red Oa  | the landowner's current lak Road will eliminate to be implemented: | t use and utilization of<br>this constraint on the | f the existing acc | ess ro  | 257776, as<br>ad/drivew | s<br>ay. |  |

N/A

N/A

 $\square$  No

 $\square$  Yes

N/A

Not Applicable (N/A)

| ATTACHMENT A: MINOR | R PROJECT REFINEMEN | T REQUEST SCREENING FOR | М |
|---------------------|---------------------|-------------------------|---|
|                     |                     |                         |   |
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|                     |                     |                         |   |

#### MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

#### RESOURCE EVALUATION

Final EIR/EIS Consistency Checklist

Final EIR/EIS.

The requested refinements were evaluated to verify that they will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest Power Line Replacement Projects (Project). The following Final EIR/EIS Consistency Checklist answers the consistency questions for each resource category and includes a description and justification, as necessary. The consistency questions were developed using the California Environmental Quality Act (CEQA) Checklist provided in the Final EIR/EIS. Refer to the Final EIR/EIS for the details on the Project impact evaluation.

| Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:   | No Change   | Potentially<br>Significant<br>Change | Not<br>Applicable |
|---|-------------|--------------------------------------|-------------------|
| Visual Resources (e.g., adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character of the site and its surroundings, create sources of light or glare, or result in an inconsistency with applicable scenic integrity objectives)?  | $\boxtimes$ |                                      |                   |
| Final EIR/EIS evaluation <sup>1</sup> : Less than significant with mitigation (Class II)/Adverse  |             |                                      |                   |
| Summary of Proposed Minor Project Refinement Impacts or   |             |                                      |                   |
| The requested refinements include an addition of a new staging area and shifting Pole P257776 approximately 50 feet east and in line with the existing pole replacement location. The requested refinements will be consistent with the project description and visual resource analysis as defined in the Final EIR/EIS. Impacts to visual character or scenic views of the area that may occur as a result of additional vegetation clearing are temporary and will be reduced with implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. The requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to visual resources as identified in the Final EIR/EIS. |             |                                      |                   |
| Air Quality (e.g. produce additional emissions, conflict with applicable local air quality plans, or expose sensitive receptors to additional pollutants)?  Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable   |             |                                      |                   |

<sup>1</sup> The Final EIR/EIS evaluations of impact significance are provided for each resource; this table notes the most significant determination within each resource section identified in the Final EIR/EIS.

Activities associated with construction and utilization of the requested refinements (e.g., the type of equipment used and the number of truck trips) are consistent with those discussed in the Final EIR/EIS and will not increase air emissions beyond what was analyzed. Although additional vegetation clearing will occur and may result in a minor increase in air quality impacts in localized areas, these activities will be short term and temporary in nature. With the implementation of air-related APMs, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to air quality as identified in the

Summary of Proposed Minor Project Refinement Impacts on Air Quality:

A-1

| Final EIR/EIS Consistency Checklist   |             |                                      |                   |  |  |
|---|-------------|--------------------------------------|-------------------|--|--|
| Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:   | No Change   | Potentially<br>Significant<br>Change | Not<br>Applicable |  |  |
| <b>Biological Resources</b> (e.g., result in temporary or permanent loss of native vegetation, preserve areas, native wildlife and/or their habitats; cause an adverse effect to jurisdictional waters or sensitive or special-status species; result in the introduction of invasive, non-native, or noxious plant species; conflict with local, regional, or state habitat conservation plan; or interfere with the movement of any resident or migratory wildlife)? Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse | $\boxtimes$ |                                      |                   |  |  |

#### Summary of Proposed Minor Project Refinement Impacts on Biological Resources:

The requested pole location was surveyed during the Project's permitting phase; however, the staging area was not. The staging area was surveyed in 2017 to determine if sensitive biological resources occur within or adjacent to the refinement areas. No special-status plant or wildlife species or other biological resource issues were identified within the refinement areas. Attachment B: Survey Area Map depicts the locations of the requested refinement areas and biological survey results.

The requested staging area and temporary pole work area will result in increases in temporary impacts (including vegetation clearing) of up to 0.23 acre of non-native grassland and 0.01 acre of Southern Mixed Chaparral, respectively. No United States (U.S.) Fish and Wildlife Service-designated critical habitat occurs within the refinement areas. All mitigation measures (MMs) defined in the Project's Mitigation Monitoring, Compliance, and Reporting Program, as well as other permit and plan conditions, will be implemented as applicable to minimize or mitigate for additional impacts. The requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to biological resources as identified in the Final EIR/EIS.

| Cultural and Paleontological Resources (e.g., cause an adverse change to Traditional Cultural Properties or historical, archeological, or paleontological resources; or disturb any human remains)? | $\boxtimes$ |  |
|---|-------------|--|
| Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse  |             |  |

#### Summary of Proposed Minor Project Refinement Impacts on Cultural and Paleontological Resources:

The new location for Pole P257776 was previously surveyed for cultural resources during pre-construction and cultural resources inventory work, as described in the *Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project in support of the Proponent's Environmental Assessment* (ASM Affiliates, Inc. [ASM] 2011). A supplemental intensive pedestrian survey was conducted by ASM in 2017 for the staging area, which was identified as being outside of the previous survey area. No new cultural resources were recorded during the supplemental survey, and no previously recorded cultural resources were identified within the refinement areas. All of the refinements are located within the Project's area of potential effect, as defined in the Project's Programmatic Agreement. The refinements will not result in impacts to any historic properties, and the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified potential impact to cultural resources as defined in the Final EIR/EIS.

The temporary pole work area and requested staging area are underlain by sedimentary rock units with Potential Fossil Yield Classification (PFYC) Class 1 and Class 3b rankings, respectively, which are within the same geological formations along Circuit (C) 78 as analyzed in the Final EIR/EIS. The ground disturbance associated with pole installation will occur in an area underlain by sedimentary rock units with a PFYC Class 1 ranking;

| Final EIR/EIS Consistency Checklist  |  |   |                             |  |  |
|--|--|---|-----------------------------|--|--|
| Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:  | No Change  | Potentially<br>Significant<br>Change                          | Not<br>Applicable           |  |  |
| therefore, additional paleontological monitoring will not be required clearing associated with the requested staging area, which is und Class 3b ranking, will not be deep enough to affect any paleonto not result in a new significant impact or a substantial increase in impact to paleontological resources as defined in the Final EIR/I   | erlain by sedimen<br>logical resources.<br>the severity of a p | tary rock units w<br>The requested r                          | vith a PFYC efinements will |  |  |
| <b>Greenhouse Gases</b> (e.g., result in a net increase of greenhouse gas emissions, or conflict with an applicable plan, policy, or regulation that reduces greenhouse gas emissions)?  |  |   |                             |  |  |
| Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse  |  |   |                             |  |  |
| Summary of Proposed Minor Project Refinement Impacts of  | Greenhouses G  | ases:   |                             |  |  |
| Activities associated with construction and utilization of the requested refinements are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional vegetation clearing will occur, the requested refinements will not trigger an exceedance of the GHG threshold of 10,000 metric tons of carbon dioxide equivalent per year or an exceedance of the County of San Diego Climate Action Plan criteria for annual grading and land clearing. The requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to GHG emissions as identified in the Final EIR/EIS. |  |   |                             |  |  |
| Public Health and Safety (e.g., result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials; emit hazardous waste within one-quarter mile of a school; be located on a hazardous materials site; result in a safety hazard for people residing or working in the Project area; interfere with an adopted emergency plan; or create safety hazards due to structural failure)?  Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse   |  |   |                             |  |  |
|  | Public Health a  | nd Safety:  |                             |  |  |
| Summary of Proposed Minor Project Refinement Impacts on Public Health and Safety:  The requested refinements occur within the area assessed in the Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California. No known hazardous materials sites are located in the requested refinements. The requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to public health and safety as identified in the Final EIR/EIS.   |  |   |                             |  |  |
| <b>Fire and Fuels Management</b> (e.g., increase the probability of a wildfire, reduce the effectiveness of firefighting, or introduce non-native plants that would contribute to ignition potential)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>   |  |   |                             |  |  |
| Summary of Proposed Minor Project Refinement Impacts of  | Fire and Fuels   | Management:   |                             |  |  |
| The requested refinements are located within a Very High Fire I the Fire and Fuels Management analysis in the Final EIR/EIS. T associated with the refinements will be managed in compliance Prevention/Protection Plan. The requested refinements will not  | Hazard Severity Zo The potential risk of with the Project's    | one, which is cor<br>of wildfire ignition<br>Construction Fir | on and spread<br>e          |  |  |

A-3

Prevention/Protection Plan. The requested refinements will not result in a new significant impact or a substantial

| Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:  | No Change   | Potentially<br>Significant<br>Change   | Not<br>Applicable  |
|--|---|--|--|
| increase in the severity of a previously identified impact to fire a EIR/EIS.  | nd fuels managen  | nent as identified   | l in the Final   |
| Hydrology and Water Quality (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)?  Final EIR/EIS evaluation: Less than significant with mitigation  | ×   |  |  |
| (Class II)/Adverse   |   |  |  |
| was conducted in 2017. The requested refinement areas do not of the jurisdiction of the California Department of Fish and Wildlife Army Corps of Engineers. Upon approval of this request, a Charles Prevention Plan for C78 will be prepared and uploaded to the Stormann Cartesian | e, Regional Water<br>nge of Informatio<br>orm Water Multip                                  | Quality Control n to the Storm W le Application a                                      | l Board, or U.S<br>Vater Pollution<br>nd Report                      |
| Tracking System to incorporate the requested refinement areas. new significant impact or a substantial increase in the severity of hydrology and water quality as identified in the Final EIR/EIS.   |   |  |  |
| new significant impact or a substantial increase in the severity of  |   |  |  |
| new significant impact or a substantial increase in the severity of hydrology and water quality as identified in the Final EIR/EIS. <b>Land Use</b> (e.g., disturb land uses at or near the Project components, divide an established community, or conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the Project)?  Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse <sup>2</sup>  | f a previously ider   | ntified significan   | t impact to  |
| new significant impact or a substantial increase in the severity of hydrology and water quality as identified in the Final EIR/EIS.  Land Use (e.g., disturb land uses at or near the Project components, divide an established community, or conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the Project)?  Final EIR/EIS evaluation: Less than significant with mitigation  | LU-1, property ov within 1,000 feet ements are located forest Land Manag significant impact | vners within 1,00 of the requested in the same Coulement Plan land to or a substantial | 00 feet of C78 refinements nty of San use zones that increase in the |

Additional construction-related noise will be generated from vegetation clearing in the requested refinements. The refinement areas are located adjacent to sensitive receptors and will result in temporary increases in noise levels; however, the work will be short term and temporary at any given location, and the Final EIR/EIS analyzed noise impacts from construction activities adjacent to sensitive receptors. Additionally, noise impacts from

A-4

<sup>&</sup>lt;sup>2</sup> SDG&E's proposed work on C157 is considered adverse and unavoidable under the National Environmental Policy Act and significant and unmitigable under CEQA (Class I).

| Final EIR/EIS Consistency Checklist  |                   |                                      |                   |  |  |
|--|-------------------|--------------------------------------|-------------------|--|--|
| Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:  | No Change         | Potentially<br>Significant<br>Change | Not<br>Applicable |  |  |
| construction activities associated with the refinements will be the With the implementation of noise-related MMs and APMs, the resignificant impact or a substantial increase in the severity of a preidentified in the Final EIR/EIS.   | equested refineme | ents will not resu                   | lt in a new       |  |  |
| Public Services and Utilities (e.g., result in construction of new, or expansion of existing, facilities for fire protection, municipal water supplies, telecommunications, and solid waste; or disrupt electric service)?  Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse   |                   |                                      |                   |  |  |
| Summary of Proposed Minor Project Refinement Impacts on  | Public Services   | and Utilities:                       |                   |  |  |
| The refinements are consistent with the public services and utilities analysis in the Final EIR/EIS, and will not require new or expanded facilities or services. In addition, any applicable refinements will be included in ongoing coordination with AT&T in accordance with MM PSU-1. The requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact to public services and utilities as identified in the Final EIR/EIS.   |                   |                                      |                   |  |  |
| Recreation (e.g., reduce access and visitation to recreation areas, preclude recreational activities, or result in increased, unauthorized access to specially designated or restricted areas)?  Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse  |                   |                                      |                   |  |  |
| Summary of Proposed Minor Project Refinement Impacts or  | Recreation:       |                                      |                   |  |  |
| Summary of Proposed Minor Project Refinement Impacts on Recreation:  The requested refinements will be located adjacent to or within the approved C78 alignment. Ma-Tar-Awa RV Camper Park is the only recreational area near C78, as identified by the Final EIR/EIS. Indirect access north of the park is available near the western portion of the alignment via Viejas Grade Road and Browns Road. Use of the refinement areas will not increase impacts to access beyond what was analyzed in the Final EIR/EIR, and more direct access is available south of the park via Interstate 8 and Willows Road. The requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact to recreation as identified in the Final EIR/EIS. |                   |                                      |                   |  |  |
| <b>Transportation and Traffic</b> (e.g., conflict with an applicable congestion management program or a plan, ordinance, or policy associated with the circulation system or alternative transportation; increase hazards due to a design feature; or result in inadequate emergency access)?  Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse   |                   |                                      |                   |  |  |

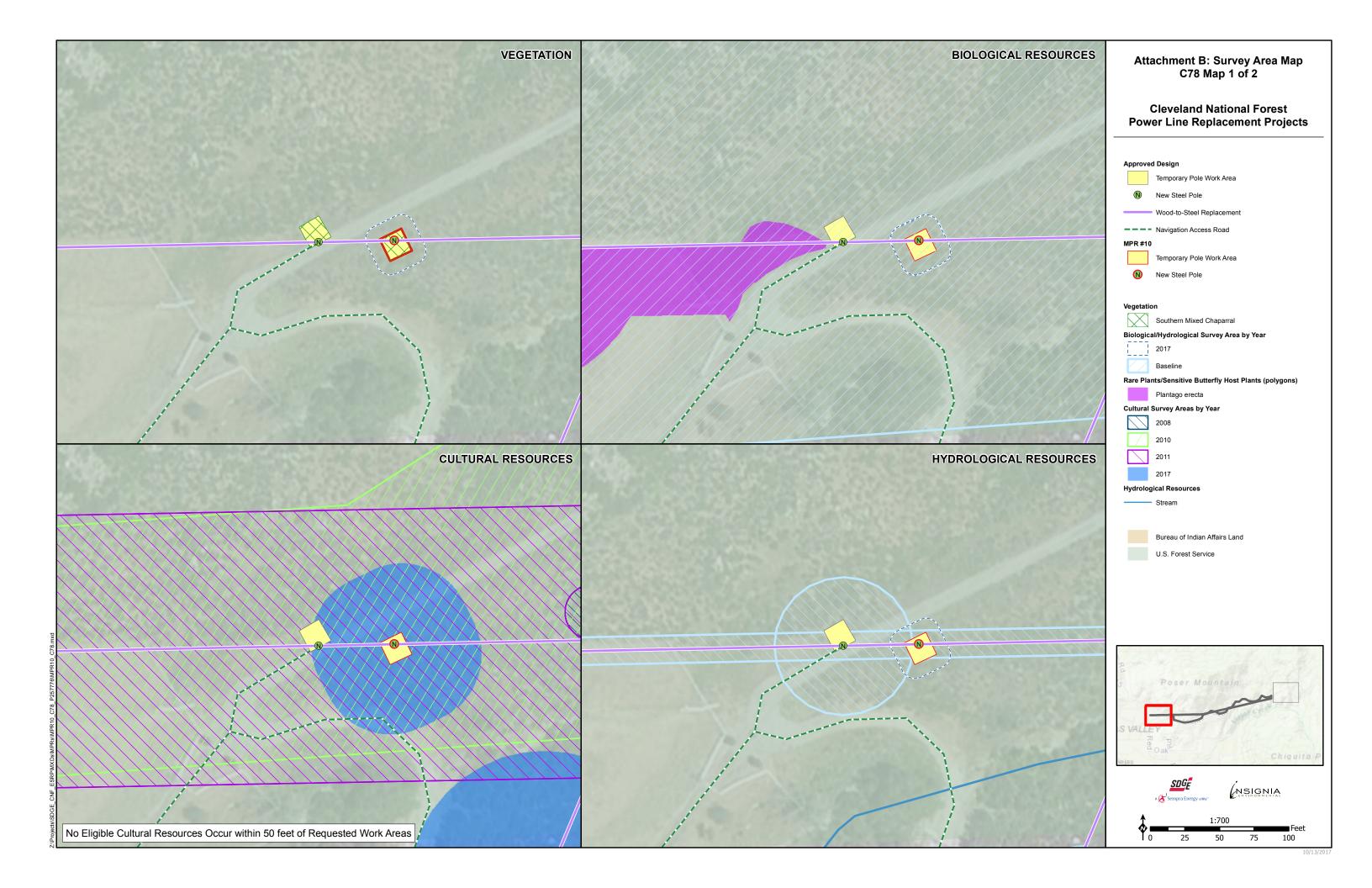
#### **Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:**

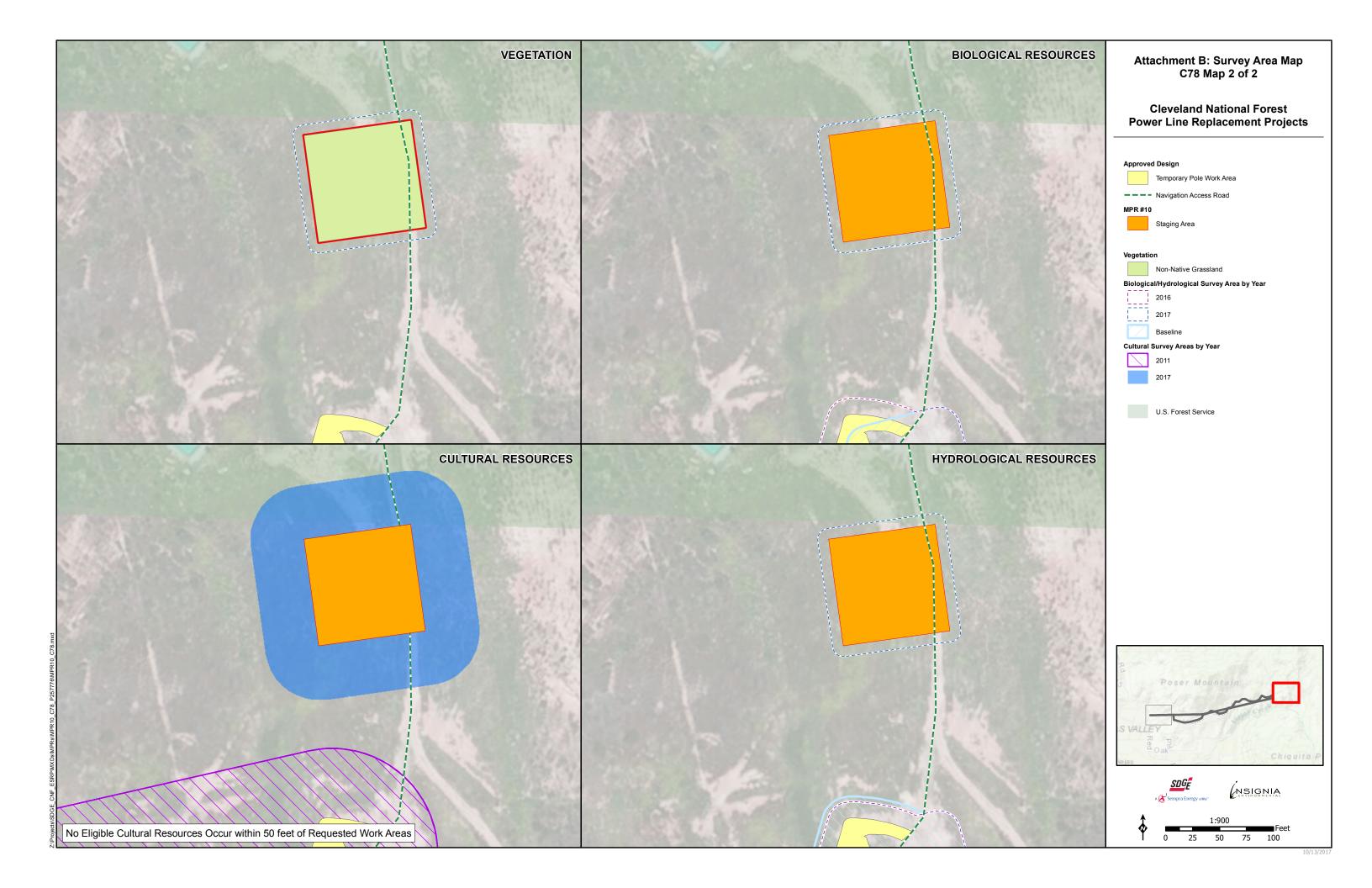
The requested refinements will not require additional or different types of construction vehicles and equipment than discussed in the Final EIR/EIS. In addition, the total number of truck trips associated with construction of the Project will not change because the location of the refinement areas will be adjacent to or within the approved C78 alignment. Therefore, the refinement areas will affect the same main roadways that were analyzed in the Final EIR/EIS, such as Viejas Grade Road, Via Arturo Road, and Red Oak Road. The requested refinements will

| Final EIR/EIS Consistency Checklist   |           |                                      |                   |
|---|-----------|--------------------------------------|-------------------|
| Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to: | No Change | Potentially<br>Significant<br>Change | Not<br>Applicable |

not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact to transportation and traffic as identified in the Final EIR/EIS.

# ATTACHMENT B: SURVEY AREA MAP





# ATTACHMENT C: PHOTOGRAPHS



# Cleveland National Forest Power Line Replacement Projects Minor Project Refinement Request #10 Attachment C: Photographs



## Photograph 1:

South-facing view of the requested location for Pole P257776 and the associated temporary workspace, as observed on September 29, 2017.



### Photograph 2:

Southwest-facing view of the requested pole workspace at Pole P257776 adjacent to Red Oak Road, as observed on September 13, 2017.



# **Photograph 3:**

North-facing view of the requested staging area, as observed on September 13, 2017.