

CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

A 🔏 Sempra Energy utility

MINOR PROJECT REFINEMENT REQUEST FORM

Date Submitted:	02-22-18		Request #:	0	15		
Date Approval Required:	03-09-18 Landowner: Various			arious			
APN: XXX-XXX-XX, XXX-XXX, XXX-XXX, XXX-						XX-XX	
Refinement from (check all that apply):							
□ Mitigation Measure	\Box APM	🛛 Proje	ect Description	\Box Dr	rawing	\boxtimes	Other
Identify source (mitigation measure, project description, etc.):							
Notice to Proceed (NTP) request #6 was approved by the California Public Utilities Commission (CPUC) and United States Forest Service on August 23, 2017 and Minor Project Refinement (MPR) request #9 was approved by both agencies on November 22, 2017. Since the approval of NTP request #6 and MPR request #9, San Diego Gas & Electric Company (SDG&E) has determined that additional work is required within and adjacent to the Rincon Substation and associated with poles approved in MPR #9. The information in this MPR request discusses SDG&E's requested refinements along Transmission Line (TL) 682. ¹ A brief description and justification of the refinements are provided on page 2 of this MPR request.						oved by go Gas & con	
Attachments (check all that apply):							
					⊠ Other (hment C: Table)	Impacts	
Under Order 2 of the Decision Granting SDG&E Permit to Construct the Cleveland National Forest Power Line Replacement Projects (D.16-05-038), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 2 of the Decision, respond "yes" or "no" to the following questions (a) through (d).							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 Environmental Impact Report/Environmental Impact Statement (EIR/EIS) study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. However, some of the refinement areas occur outside of the baseline survey areas. As a result, supplemental hydrological, biological, and cultural resources surveys were conducted in 2016, 2017, and 2018. Additional details regarding the specific surveys conducted are provided in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form.				nental Figure S Il, and rding	□ Yes	⊠ No	
(b) Will the proposed refinement 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 EIR/EIS?				eria	□ Yes	🛛 No	
(c) Does the proposed refinement c or policy?	conflict with an	ny mitigat	ion measure or a	pplicable	law	□ Yes	🖾 No
(d) Does the proposed refinement t	rigger an add	itional per	mit requirement	?		□ Yes	🛛 No

¹ This MPR request only includes components within Phase II of TL682.

Describe refinement being requested (attach drawings and photos as needed):

SDG&E requests the following refinements along Phase II of TL682:

- addition of seven anchors, work at two existing anchors², and removal of three anchors, as well as the associated anchor work areas;
- addition of approximately 0.05 mile of construction-only access roads (vegetation clearing and minor grading may occur) and 0.04 mile of navigation access roads (no vegetation clearing or ground disturbance will be required);
- addition of four 12 kilovolt (kV) wood-to-steel replacement poles, six pole-top-only work locations, and one new steel distribution tap pole, as well as associated temporary pole work areas;
- shifting of Pole P419890 and the associated temporary pole work area by approximately 19 feet³; and
- removal of the existing Pole P258156S⁴ and inclusion of associated temporary pole work area.

Attachment B: Comparison Map depicts the facilities and workspaces approved in MPR #9, NTP #6, and various Workspace Adjustments in comparison to the requested refinements, as described in this MPR request. The activities associated with the construction and utilization of the refinement areas will occur in the same manner as described in the Final EIR/EIS for construction of the Project. The requested refinements will result in an increase of up to 0.52 acre of temporary impacts (of which approximately 0.01 acre is classified as native vegetation) and less than 0.01 acre of permanent impacts.⁵ The breakdown of the temporary and permanent impacts is summarized in Attachment C: Impacts Table.

Provide need for refinement (attach drawings and photos as needed):

SDG&E is requesting the refinements for the following reasons:

- The engineering design for facilities adjacent to the Rincon Substation was not finalized until after the submittal and approval of MPR request #9. The anchor and pole work are needed to complete the remaining electrical work for the Rincon Substation.
- Pole P419890 was shifted at the property owner's request. In addition, the associated construction-only access road will allow bucket truck access to the existing and replacement pole locations, as well as minimize impacts to orchard trees.
- The construction-only and navigation access roads at Pole P815224 will minimize lane closures and use of the State Route 76 shoulder while completing pole and anchor hole digging and pole setting, as well as avoid substantial tree trimming and removal during pole setting.
- The removal location for Pole P258156S and the new anchor for Pole P161304 were inadvertently omitted from MPR request #9 and are required to complete the work at these locations.

Date refinement is expected t	o be implemented:	03-10-18			
Resource Agency Coordina	ation				
Resource Agency	Name	Action Required	Date		entation ched if yes)
Not Applicable (N/A)	N/A	N/A	N/A	□ Yes	□ No

² Work at the existing anchors will include replacing the down guy wire from the anchor to the replacement pole, but no ground disturbance will be required.

³ There is now a removal pole symbol in the original location approved in MPR #9, and a new tap pole symbol for the new location.

⁴ This pole is a distribution tap pole replacement that was approved in MPR #9.

⁵ A few of the refinements overlap with previously approved workspaces. Therefore, any area that overlaps is not included in the temporary and permanent totals.

ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

RESOURCE EVALUATION

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 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 below each resource category, as necessary. The consistency questions were developed using the California Environmental Quality Act Checklist provided in the Final EIR/EIS. Refer to the Final EIR/EIS for details on the Project's impact evaluation.

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 Significant Change	N/A
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)?			
Final EIR/EIS evaluation ⁶ : Significant and unavoidable (Class I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Visual Resources:

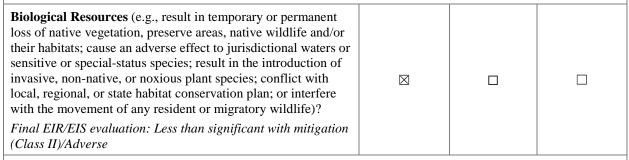
The requested refinements are mostly minor, temporary workspace additions or adjustments to the locations of existing facilities and/or approved Project components that occur near the transmission line right-of-way (ROW). The replacement of four existing wood distribution poles with new steel distribution poles that are somewhat larger (10 to 20 feet taller) will not substantially increase impacts to visual resources because the poles are replacing existing structures adjacent to the Rincon Substation and the transmission line ROW and will be similar in appearance to the nearby new steel transmission line structures. For similar reasons, the new steel distribution tap pole will also not substantially increase impacts to visual resources. The requested refinements will be consistent with the visual resource analysis defined in the Final EIR/EIS, and they will not impact the Henshaw Scenic Vista or substantially affect existing views from State Route (SR-) 76 (an eligible state scenic highway). Impacts to the visual character of the area may occur as a result of minor grading and vegetation clearing; however, these minor impacts will be temporary and reduced with implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. Therefore, 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.

⁶ 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.

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 Significant Change	N/A
Air Quality (e.g. produce additional emissions, conflict with applicable local air quality plans, or expose sensitive receptors to additional pollutants)?	\boxtimes		
Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Air Quality:

Activities associated with construction and utilization of the refinement areas (e.g., the type of equipment used and the number of truck trips) will be consistent with those discussed in the Final EIR/EIS and will not increase air emissions beyond what was analyzed. Similar to MPR #9, the requested refinements are located adjacent to sensitive receptors. Accordingly, additional minor grading and vegetation clearing may result in a minor increase in air quality impacts in localized areas. However, minor grading and vegetation clearing will be short term and temporary; and with implementation of APM AIR-01 through APM AIR-05, use of the refinement areas will not expose adjacent sensitive receptors to substantial pollutant concentrations, which is consistent with the analysis in the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in the Final EIR/EIS.



Summary of Proposed Minor Project Refinement Impacts on Biological Resources:

Some of the requested refinement areas were previously surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial surveys that were conducted for the Project. In addition, the requested refinement areas were surveyed in 2018 for sensitive biological resources during engineering field reviews. No special-status plant or wildlife species or other biological resource issues were identified within or adjacent to the refinement areas that were not analyzed in the Final EIR/EIS.

The requested refinements will result in an increase of up to 0.52 acre of temporary impacts and less than 0.01 acre of permanent impacts (including vegetation communities and developed/disturbed areas). This includes temporary and permanent impacts to approximately 0.01 acre of mixed oak woodland and approximately 0.01 acre of non-native grassland. The requested refinements do not occur within United States (U.S.) Fish and Wildlife Service-designated critical habitat. All APMs and 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. Thus, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final EIR/EIS.

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 Significant Change	N/A
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)?			
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

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

Some of the requested refinement areas were previously surveyed for cultural resources during pre-construction and cultural resources inventory work in 2011, 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* (Schaefer and Williams, 2011 [Revised 2013]). Supplemental intensive pedestrian surveys were conducted by ASM Affiliates, Inc. in 2016, 2017, and 2018 for the refinement areas that were identified as being outside of the previous survey coverage in 2011. No new cultural resources were recorded during the supplemental surveys, 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. Therefore, the requested 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 requested refinements are underlain by the same geological formations along Transmission Line (TL682) as analyzed in the Final EIR/EIS, which includes geologic rock units/formations assigned a rank of Potential Fossil Yield Classification (PFYC) Class 1 (very low sensitivity) and Class 3 (moderate or unknown sensitivity). There are a number of requested refinements underlain by sedimentary rock units with a PFYC Class 3 ranking, including new distribution tap Pole P212640 and direct-bury replacements for Poles P104051, P14444, P810960, and P312158. In accordance with APM CUL-08, a paleontological monitor will be present for excavation activities in areas that are underlain by PFYC Class 3 deposits. In addition, the Paleontological Monitoring & Treatment Plan will be updated to include the additional poles that require monitoring. The disturbance from minor grading and vegetation clearing associated with the other types of refinements will not be deep enough to affect any paleontological resources. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to paleontological resources as identified in the Final EIR/EIS.

adverse		Greenhouse Gases (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)? <i>Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse</i>			
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Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:

Activities associated with construction and utilization of the requested refinement areas are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional minor grading and vegetation clearing will occur, it will not trigger an exceedance of the GHG threshold of 10,000 metric tons of carbon dioxide equivalent per year or the County of San Diego Climate Action Plan criteria for annual grading and land clearing due to the small change in acreage. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to GHG emissions as identified in the Final EIR/EIS.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation</i> (<i>Class II</i>)/Adverse			

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 refinement areas. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public health and safety as identified in the Final EIR/EIS.

Fire and Fuels Management (e.g., increase the probability of a wildfire, reduce the effectiveness of firefighting, or introduce non-native plants that would contribute to ignition potential)?	\boxtimes	
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

Summary of Proposed Minor Project Refinement Impacts on Fire and Fuels Management:

The requested refinements will be located within the Moderate, High, and Very High Fire Hazard Severity Zones, which is consistent with the Fire and Fuels Management analysis in the Final EIR/EIS. The potential risk of wildfire ignition and spread associated with the refinement areas will be managed in compliance with the Project's Construction Fire Prevention/Protection Plan. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to fire and fuels management as identified in the Final EIR/EIS.

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 Significant Change	N/A
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: Significant and unavoidable (Class I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:

Some of the requested refinement areas were previously surveyed for the presence of waters of the state and/or the U.S. (i.e., jurisdictional wetlands or non-wetland waters) during initial surveys that were conducted for the Project. In addition, the requested refinement areas were surveyed in 2018 for water resources during engineering field reviews. The requested refinement areas do not contain any waters of the state or the U.S. under the jurisdiction of the California Department of Fish and Wildlife, Regional Water Quality Control Board, or U.S. Army Corps of Engineers. Although some of the refinement areas are located near Potrero Creek and Plaisted Creek, impacts to these creeks will be avoided, and no additional jurisdictional water permitting will be required. To minimize potential impacts from erosion and off-site sedimentation during construction, the Storm Water Pollution Prevention Plan for TL682 will be updated with the refinement areas upon approval of this request. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to 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: Significant and unavoidable (Class I)/Adverse and unavoidable			
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Summary of Proposed Minor Project Refinement Impacts on Land Use:

In accordance with the Construction Notification Plan and MM LU-1, property owners within 1,000 feet of TL682 were notified of construction activities on June 7, 2017. This notification included the majority of property owners within 1,000 feet of the requested refinements. Property owners of three Assessor's Parcel Numbers (APNs) within 1,000 feet of the requested refinements were not notified; however, the property owner of one of those APNs (the State of California) was already included in the notification process. The property owner for the other two APNs will be notified 15 days prior to use of the refinement areas. The requested refinements will not introduce a new land use, establish a permanent barrier or obstacle between uses, or create a physical division or separation of use. In addition, the requested refinements will not conflict with the applicable land use plans, policies, or regulations of an agency with jurisdiction over the Project, as they are located in the same County of San Diego land use and zoning designations that were analyzed in the Final EIR/EIS. Therefore, the requested refinements will not result in new significant impacts or a substantial increase in the severity of a previously analyzed impact to land use as identified in the Final EIR/EIS.

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 Significant Change	N/A
Noise (e.g., disturb sensitive receptors and violate local rules, standards, and/or ordinances; or cause ground borne vibration)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>			

Summary of Proposed Minor Project Refinement Impacts on Noise:

Additional construction-related noise will be generated within the requested refinement areas due to anchor and pole-top work, vegetation removal, minor grading, stringing conductor, pole installation/replacement, and large equipment operation. Similar to MPR #9, the requested refinements are located adjacent to sensitive receptors. Accordingly, use of the refinement areas may result in temporary increases in noise levels. However, the construction activities will be short term and temporary at any given location, and large equipment use will be temporary and intermittent. In addition, with implementation of noise-related MMs and APMs, noise impacts from construction activities associated with the refinement areas will be the same as those analyzed in the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to noise as identified in the Final EIR/EIS.

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)?	\boxtimes	
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 requested 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. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public services and utilities as identified in the Final EIR/EIS.

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 Significant Change	N/A
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)?	\boxtimes		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

Summary of Proposed Minor Project Refinement Impacts on Recreation:

The requested refinement areas will be located adjacent to or within close proximity to the approved TL682 alignment; thus, the refinement areas will also be located near the Oak Knoll Campground, as described in the Final EIR/EIS. Construction vehicles will use the same roadways analyzed in the Final EIR/EIS (e.g., SR-76 and Valley Center Road), as well as smaller public and private roads along the alignment, which may affect timely access to the campground. However, implementation of a Traffic Control Plan (APM TRANS-04) will reduce this impact, and direct access to and parking at the campground will be maintained during construction. Therefore, use of the refinement areas will not substantially reduce or preclude access or visitation to these recreational areas or increase the possibility of unauthorized access to specially designated or restricted areas, consistent with the Final EIR/EIS. In conclusion, 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.

Transportation and Traffic (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 with mitigation (Class II)/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 those discussed in the Final EIR/EIS for construction of the approved Project. In addition, the total number of truck trips associated with construction of the Project will not change, and the refinements will affect the same roadways analyzed in the Final EIR/EIS (e.g., SR-76 and Valley Center Road), as well as a few smaller public and private roads. With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to the existing levels of service (LOS)⁷ will be adequately addressed. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to transportation and traffic as identified in the Final EIR/EIS.

⁷ SR-76 has an LOS of B, and an LOS does not exist for Valley Center Road and the smaller public and private roads.

ATTACHMENT B: COMPARISON MAP













ATTACHMENT C: IMPACTS TABLE

ATTACHMENT C: IMPACTS TABLE

Table 1: Impacts Table lists the temporary and permanent impacts¹ of this Minor Project Refinement (MPR) request by vegetation type and workspace type.

Table 1: Impacts Ta	able
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Impost I costion	Approximate Impacts (acres)			
Impact Location	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground	
Permanent Impacts				
Anchors			<0.01	
Poles			<0.01	
Total			<0.01	
Temporary Impacts				
Access Roads ²	0.01		0.07	
Anchor Work Areas			0.01	
Pole Work Areas		0.01	0.42	
Total	0.01	0.01	0.50	
MPR #15 Total	0.01	0.01	0.50	

¹ A few of the refinements overlap with previously approved workspaces. Therefore, any area that overlaps is not included in the temporary and permanent totals.

² San Diego Gas & Electric Company uses three types of access roads—maintained, navigation, and construction only. Construction-only access roads can sometimes require improvements and maintenance, which create temporary impacts to vegetation.