ATTACHMENT B: MINOR PROJECT REFINEMENT REQUEST



CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM 02-10-20 044 **Date Submitted: Request #:** 03-23-20 Various **Date Approval Required:** Landowner: 333-030-17, 333-060-15, 333-061-02, 333-061-03, 333-070-05, 333-070-06, 333-120-05, 333-120-12, 333-120-17, 333-120-18, 333-120-19, 333-121-02, **APNs:** 333-121-08, 333-121-10, 333-121-11, 333-121-12, 334-040-15, 334-040-17. 334-040-19, 334-090-12, and 334-220-01 **Refinement from (check all that apply):** □ Mitigation Measure \Box APM ⊠ Project Description \boxtimes Drawing ⊠ Other Identify source (mitigation measure, project description, etc.): As described in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cleveland National Forest Power Line Replacement Projects (Project), removal of Transmission Line (TL) 626 from service (also referred to as TL626RFS) and the conversion of TL626 from 69 kilovolt (kV) to 12 kV are part of the Environmentally Superior Alternative and the Federal Preferred Alternative. As shown in Figure E-1: Environmentally Superior Alternative (CEQA) and Federal Preferred Alternative (NEPA) of the Final EIR/EIS, the 69 kV to 12 kV conversion on TL626 includes northern and southern sections (also referred to as TL626 Conversion North and TL626 Conversion South). The Environmentally Superior Alternative allows for the conversion of 13.3 miles of TL626 to 12 kV distribution line, and the Federal Preferred Alternative allows for the conversion of 6.8 miles of TL626 to 12 kV distribution line. The design included in the Final EIR/EIS for TL626 Conversion South starts at the Descanso Substation and stops near the intersection for removal/undergrounding of Circuit (C) 79A on Cuyamaca Peak. However, San Diego Gas & Electric Company's (SDG&E's) final design includes an additional 4.3 miles of conversion between C79A and Johnson Creek in order to serve existing customers located along that portion of the TL626 alignment. The information in this MPR request discusses SDG&E's requested refinements to the Environmentally Superior Alternative and Federal Preferred Alternative for TL626 Conversion South. A brief description and justification of the refinements are provided on page 2 of this MPR request. Attachments (check all that apply): ⊠ Refinement Request \boxtimes Maps \boxtimes Other Screening Form \Box Photos (See Attachment B: (See Attachment C: Impacts (see Attachment A: Minor **Project Refinement Request** Comparison Map) Table) Screening Form) 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). (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 \Box Yes 🖾 No study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. The refinements occur partially within the baseline biological, cultural, and hydrological survey areas. Supplemental hydrological, biological, and cultural resources surveys were conducted in 2017, 2018, 2019, and 2020. Additional details regarding the specific surveys conducted are

provided in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form.		
(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? A discussion of changes in significant impacts due to the requested refinements is based on criteria used in the Final EIR/EIS and is resource area-specific. The changes to each resource area are fully analyzed in Attachment A: Minor Project Refinement Request Screening Form.	□ Yes	🖾 No
(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?	□ Yes	🖾 No
(d) Does the proposed refinement trigger an additional permit requirement?	□ Yes	🖾 No
Describe refinement being requested (attach drawings and photos as needed):		

SDG&E requests to convert an additional 4.3 miles¹ of TL626 to 12 kV distribution line instead of removing it from service. The additional conversion will include:

- 61 new anchors, replacement of one anchor, work at one existing anchor², and removal of 39 anchors, as well as addition of the associated anchor work areas;
- addition of approximately 390 feet of construction-only access roads (for which vegetation removal and minor grading may occur); and
- 18 new steel poles³, fifty-one 12 kV wood-to-steel replacement poles⁴, three removal poles, and eight poletop work-only poles, as well as the associated temporary pole work areas.

Attachment B: Comparison Map depicts TL626RFS poles and overhead removal approved in the Environmentally Superior Alternative and the Federal Preferred Alternative and the temporary workspaces and access approved in Notice to Proceed (NTP) #25 in comparison to the final design for TL626 Conversion South, 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. As stated in the Final EIR/EIS, the removal of TL626 from service alternative "would result in temporary and permanent ground disturbance similar to that described for the proposed project," which included the wood-to-steel replacement of TL626. The requested refinements will result in a total of approximately 0.94 acre of temporary impacts (of which approximately 0.52 acre are 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):

It was acknowledged in the Final EIR/EIS that conversion of portions of TL626 to 12 kV was needed to continue providing service to existing customers. However, the mapping for the Environmentally Superior Alternative and the Federal Preferred Alternative did not account for the existing customers located between C79A and Johnson Creek (i.e., north of the C79 removal section shown in Figure E-1 of the Final EIR/EIS). Removing that section of TL626 from service would render those customers without power. As a result, an additional 4.3 miles of 12 kV conversion is needed to continue to supply power to those customers.

Date refinement is expected to be implemented: 04-01-20

¹ This number includes approximately 0.90 mile of new overhead service associated with a small realignment along Boulder Creek Road that was requested by the USFS because of safety and fire concerns associated with high winds in that area.

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

³ Thirteen of these new steel poles are associated with a small realignment along Boulder Creek Road.

⁴ Forty-six of these poles are replacing existing 69 kV facilities and five poles are replacing existing 12 kV facilities.

⁵ Some refinements overlap with previously approved NTP components. The overlapping area is not included in the impact totals.

Resource Agency Coordin	ation				
Resource Agency	Name	Action Required	Date	·	entation hed if yes)
Not Applicable (N/A)	N/A	N/A	N/A	□ Yes	🖾 No

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 (SDG&E) Cleveland National Forest (CNF) 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)? <i>Final EIR/EIS evaluation⁶: Significant and unavoidable (Class I)/Adverse and unavoidable</i>			

Summary of Proposed Minor Project Refinement Impacts on Visual Resources:

The Environmentally Superior Alternative and the Federal Preferred Alternative only included the removal of transmission poles along this portion of Transmission Line (TL) 626; therefore, conversion of an additional 4.3 miles of TL626 to 12 kilovolt (kV) distribution line will result in an increase in impacts to visual resources for this portion of TL626. However, as described in the Final EIR/EIS, TL626 is an existing feature in the landscape so "the introduction of replacement poles would not substantially affect the existing visual character or quality of the site and surroundings." In addition, converting 69 kV facilities to 12 kV will reduce the visual prominence of the poles and lines due to "the shorter form of the 12 kV poles (maximum estimated height of 60 feet for 12 kV vs. 120 feet for the 69 kV pole)." Because the replacement poles will be shorter and the weathered steel finish will resemble the existing wood 69 kV poles, the visual contrast of these poles within the landscape is anticipated to be relatively weak. Further, the deviations in scale will "enhance scenic quality by reducing existing view blockage and visual dominance." As such, "conflicts with lands managed according to High scenic integrity are not anticipated to occur."⁷ Therefore, the requested refinements will not substantially increase impacts to visual resources beyond what was already analyzed in the Final EIR/EIS.

The replacement of existing wood 12 kV poles with new steel 12 kV poles that are somewhat larger (i.e., 10 to 15 feet taller) will not substantially increase impacts to visual resources because the poles are replacing existing structures adjacent to the existing right-of-way (ROW) and will be similar in appearance to the new adjacent steel 12 kV structures. Similarly, the new steel 12 kV poles (including the 13 new poles associated with the small realignment along Boulder Creek Road) will not substantially increase impacts to visual resources as they will occur within or adjacent to the existing ROW.

Impacts to the visual character of the refinement areas may occur as a result of additional minor grading and/or vegetation removal. However, these impacts will be temporary and reduced with the implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. In addition, the requested refinements will be

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.

⁷ The portion of the TL626 alignment being analyzed in this Minor Project Refinement (MPR) request falls within the High and Moderate scenic integrity objective levels assigned by the United States (U.S.) Forest Service (USFS).

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
consistent with the visual resource analysis in the Final EIR/EIS substantially affect existing views from an eligible State Scenic I			
In conclusion, the requested refinements will not result in a new severity of a previously analyzed impact to visual resources as id	0 1		increase in the
Air Quality (e.g. produce additional emissions, conflict with applicable local air quality plans, or expose sensitive receptors			

 applicable local air quality plans, or expose sensitive receptors

 to additional pollutants)?

 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 requested 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. Some of the refinement areas are located within 1,000 feet of sensitive receptors. Potential air quality impacts to sensitive receptors within 1,000 feet of Project components were analyzed in the Final EIR/EIS. While any additional minor grading and/or vegetation removal required for the refinement areas may result in a minor increase in air quality impacts in localized areas, these activities will be short-term and temporary. With the implementation of APM AIR-01 through APM AIR-05, use of the refinement areas will not expose nearby 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.

Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse				
---	--	--	--	--

Summary of Proposed Minor Project Refinement Impacts on Biological Resources:

The requested refinement areas were partially surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial Project surveys. In addition, the requested refinement areas were surveyed in 2017, 2018, 2019, and 2020 during engineering field reviews and the Pre-Activity Survey Report process in accordance with SDG&E's Subregional Natural Community Conservation Plan (NCCP). Other supplemental surveys conducted in 2018 and 2019 along TL626 included a bat roost assessment and focused surveys for Townsend's big-eared bat (*Corynorhinus townsendii*) and all other bat species, protocol-level surveys for Hermes copper butterfly (*Lycaena hermes*), and focused surveys for special-status plants.

The requested refinements will result in a total of approximately 0.92 acre of temporary impacts and less than

⁸ The scenic vista at the Inaja Memorial National Recreation Trail is located near the northern TL626RFS section, which is more than six miles from TL626 Conversion South.

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
0.01 acre of permanent impacts. This includes approximately 0 permanent impacts) to developed/disturbed areas ⁹ and approxin vegetation communities ¹⁰ :			
 approximately 0.03 acre of mixed oak woodland; approximately 0.49 acre of southern mixed chaparral; a less than 0.01 acre of southern riparian forest. 	und		
Special-status plants and special-status butterfly host plants—in koeleriodes), Tecate cypress (<i>Hesperocyparis</i> [<i>Cupressus</i>] forbe Cleveland's bush monkeyflower (<i>Mimulus clevelandii</i>), narrow Engelmann's oak (<i>Quercus engelmannii</i>), stiffbranch bird's bea (<i>Plantago erecta</i>), woolly plantain (<i>Plantago patagonica</i>), and s within or adjacent to the requested refinement areas. Impacts to extent possible by installing fencing or flagging near known loc	esii), Ramona hork petal rein orchid (k (<i>Cordylanthus r</i> spiny redberry (<i>Rh</i> these plants will	celia (Horkelia tr Piperia leptopet igidus), western amnus crocea)–	<i>uncata</i>), <i>ala</i>), plantain –are located
No impacts to U.S Fish and Wildlife Service-designated critical Temporary impacts of approximately 0.01 acre to suitable unoc temporary impacts of approximately 0.09 acre and permanent ir copper butterfly habitat will occur. ¹² Impacts to this species was mitigation measures (MMs) defined in the Project's Mitigation Program—as well as other permit and plan conditions—will be mitigate for any additional impacts. Thus, the requested refiner a substantial increase in the severity of a previously analyzed in Final EIR/EIS.	cupied Hermes cop npacts of less than as analyzed in the Monitoring, Comp implemented as ap nents will not resu	pper butterfly ha 0.01 acre to occ Final EIR/EIS; a bliance, and Repo pplicable to mini It in a new signif	bitat, and upied Herme II APMs and orting mize or ficant impact
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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation</i>			
(Class II)/Adverse			
Summary of Proposed Minor Project Refinement Impacts o	n Cultural and P	aleontological R	lesources:
All of the requested refinements are located within the Project's Project's Programmatic Agreement. The refinement areas were pre-construction and cultural resources inventory work in 2008 and Treatment of Cultural Resources in the Cleveland National Increased Fire Safety Project in support of the Proponent's Env 2011 [Revised 2013]). Supplemental intensive pedestrian survey	partially surveyed and 2009, as descu Forest Transmiss ironmental Assess	l for cultural reso ribed in <i>Inventor</i> <i>ion and Distribu</i> <i>sment</i> (Schaefer a	ources during y, <i>Evaluation</i> tion Line and Williams,

2017, 2018, and 2019 for the refinement areas that were identified as being outside of the previous survey areas.

Two new cultural resources were recorded during the supplemental surveys, and seven previously recorded

⁹ These impacts fall in the Agricultural/Disturbed/Developed/Bare Ground impact category for SDG&E's Subregional NCCP.

¹⁰ Mixed oak woodland, southern mixed chaparral, and southern riparian forest fall in the Native Vegetation impact category for SDG&E's Subregional NCCP.

¹¹ Per the Project's approved Special-Status Plant Species Salvage and Relocation Plan, Tecate cypress and Engelmann's oak must be avoided and no treatment is required for the other plant species.

¹² Some refinements overlap with previously approved NTP components. The overlapping area is not included in the impact totals.

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 resources were identified near or within the refinement a resources, one was not relocated in the field during the supplement American monitors will be required and environmentally sensitive resources located within 50 feet of a refinement area, which will resources. Further details on these cultural resources are include resources letter report, which will be submitted to the USFS in s requested refinements will not result in a new significant impact previously analyzed impact to cultural resources as identified in	ental surveys. Arc we area fencing wi avoid significant d in a supplement upport of this MP or a substantial ir	chaeological and ill be used to pro- impacts to these cal confidential c R request. There acrease in the sev	Native tect cultural ultural efore, the
The requested refinement areas are underlain by geologic rock u Fossil Yield Classification (PFYC) Class 1 (very low sensitivity There are a number of requested refinements underlain by sedim including four direct-bury poles (i.e., Poles P258587, P259700, I APM CUL-08, a paleontological monitor will be present for exc of new steel poles that are located in areas that are underlain by P Paleontological Monitoring & Treatment Plan will be updated to monitoring. The disturbance from minor grading and vegetation refinements will not be deep enough to affect any paleontological refinements will not result in a new significant impact or a subst analyzed impact to paleontological resources as identified in the	and Class 3 (modentary rock units P259702, and P25 avation activities PFYC Class 3 dep include the addit removal associat al resources. Ther antial increase in t	derate or unknow with a PFYC Cla 9703). In accord associated with to osits. In addition ional poles that need with the other efore, the request	vn sensitivity) ass 3 ranking, dance with he installatior n, the require types of sted

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)?

Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse

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 removal will occur, these activities 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. 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 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)?	\square	
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 High and Very High Fire Hazard Severity Zones, which were included in 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.

Hydrology and Water Quality (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)? <i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i> <i>I)/Adverse and unavoidable</i>			
--	--	--	--

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

The requested refinement areas were partially surveyed for the presence of waters of the state and/or the U.S. (i.e., jurisdictional wetlands or non-wetland waters) during initial Project surveys. In addition, supplemental water resource surveys of the refinement areas were conducted in 2018, 2019, and 2020. The refinement areas are located near Johnson Creek, Boulder Creek, Conejos Creek, and various drainages, but impacts to waters of the state and/or U.S. will be avoided. Therefore, no jurisdictional water permitting will be required for any of the refinement areas. To minimize short-term, potential impacts from erosion and off-site sedimentation during construction, the refinement areas will be included in a Change of Information for the Circuit (C) 79A, TL625C, and TL629A Storm Water Pollution Prevention Plan (Waste Discharge Identification #9 37C386349) and submitted to the State Water Resources Control Board's Stormwater Multiple Applications and Report Tracking System. In conclusion, the requested refinements will not result in a new significant impact or a substantial

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
increase in the severity of a previously analyzed impact to hydrol EIR/EIS.	ogy and water qu	ality as identifie	d in the Final
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			

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 TL626 Conversion South will be notified of construction activities associated with NTP request #26, and the property owners within 1,000 feet of the requested refinements will be included in that notification process. 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 are located in the same County of San Diego land use and zoning designations and same CNF Land Management Plan (LMP) land use zones that were analyzed in the Final EIR/EIS.

As discussed in the Final EIR/EIS, portions of the existing TL626 alignment traverse the No Name Inventoried Roadless Area (IRA) and Sill Hill IRA, and there are multiple refinements that will occur partially or fully within the No Name IRA¹³ and Sill Hill IRA¹⁴. Consistent with the USFS 2001 Roadless Area Conservation Rule, none of the refinements will require new road construction or reconstruction.¹⁵ The majority of the refinements occur within the Back Country land use zone of the CNF LMP, which allows "Developed Facilities." Poles P258589 to P258579 occur within the Back Country Non-Motorized (BCNM) land use zone of the CNF LMP, which allows "Non-Recreational Special Uses: Low Intensity Land Use"¹⁶ by exception. As stated in the CNF LMP, "Specific uses are allowed on national forests except when identified as not suitable, because of law, national or regional policy, or the revised forest plan." As such, "activities may occur unless the forest plan says that they cannot." Because "Non-Recreational Special Uses: Low Intensity Land Use" is not defined as a "Not Suitable" activity, replacement of this pole range within the BCNM land use zone can occur with USFS approval.

In conclusion, 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.

¹³ These refinements include anchor and/or pole work areas associated with Poles Z372311, P258546, P258564, P258570, P259698, P259699, P259700, P259701, P259702, P259703, P259704, P259705, P259706, P259707, P259708, P259709, and P259710.

¹⁴ These refinements include anchor and/or pole work areas associated with Poles P258579, P258580, P258581, P258582, P258583, P258584, P258585, P258586, P258587, P258588, P258589, and P258590.

¹⁵ Existing access roads in these areas may need to be maintained during construction. According to the USFS 2001 Roadless Area Conservation Rule, "road maintenance" is not considered "road reconstruction."

¹⁶ This pole range overlaps with an existing access road that may be decommissioned per the USFS Record of Decision. According to the Final EIR/EIS, the portions of SDG&E's alignment that lack roads are considered "Non-Recreational Special Uses: Low Intensity Land Use."

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 work, vegetation removal, minor grading, wire stringing, and large equipment operation. As stated previously in the Air Quality section, the refinement areas are located within 1,000 feet of sensitive receptors. Potential noise impacts to sensitive receptors within 1,000 feet of Project components were analyzed in the Final EIR/EIS. While the use of the refinement areas may result in temporary increases in noise levels, the construction activities will be short-term and temporary at any given location. In addition, with implementation of noise-related MMs and APMs, noise impacts from construction activities associated with the refinement areas will be consistent with 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)?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.

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 on Recreation:

The requested refinement areas will be located within or adjacent to the approved TL626 alignment. Similar to the Environmentally Superior Alternative and the Federal Preferred Alternative that were analyzed in the Final EIR/EIS, the refinement areas will also be located near Cedar Creek Road, Three Sisters Waterfall Trailhead, the conceptual route for the Trans-County Trail, and the existing Boulder Creek Pathway¹⁷.

As discussed in the Final EIR/EIS, construction activities along Boulder Creek Road could temporarily impede access to the previously mentioned recreational facilities due to temporary lane closures and reduced travel

¹⁷ The Boulder Creek Pathway is only identified south of Circuit 79A in the County of San Diego's Community Trails Master Plan.

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

speeds. However, implementation of APM TRANS-01, APM TRANS-04, and APM TRANS-05 will minimize impacts associated with impeded access. In addition, implementation of MM LU-1 will reduce conflicts between recreationists and construction activities through public noticing. Therefore, consistent with the Final EIR/EIS, use of the refinement areas will not substantially reduce or preclude access or visitation to the previously mentioned recreational facilities.

In conclusion, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed 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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>			
--	--	--	--

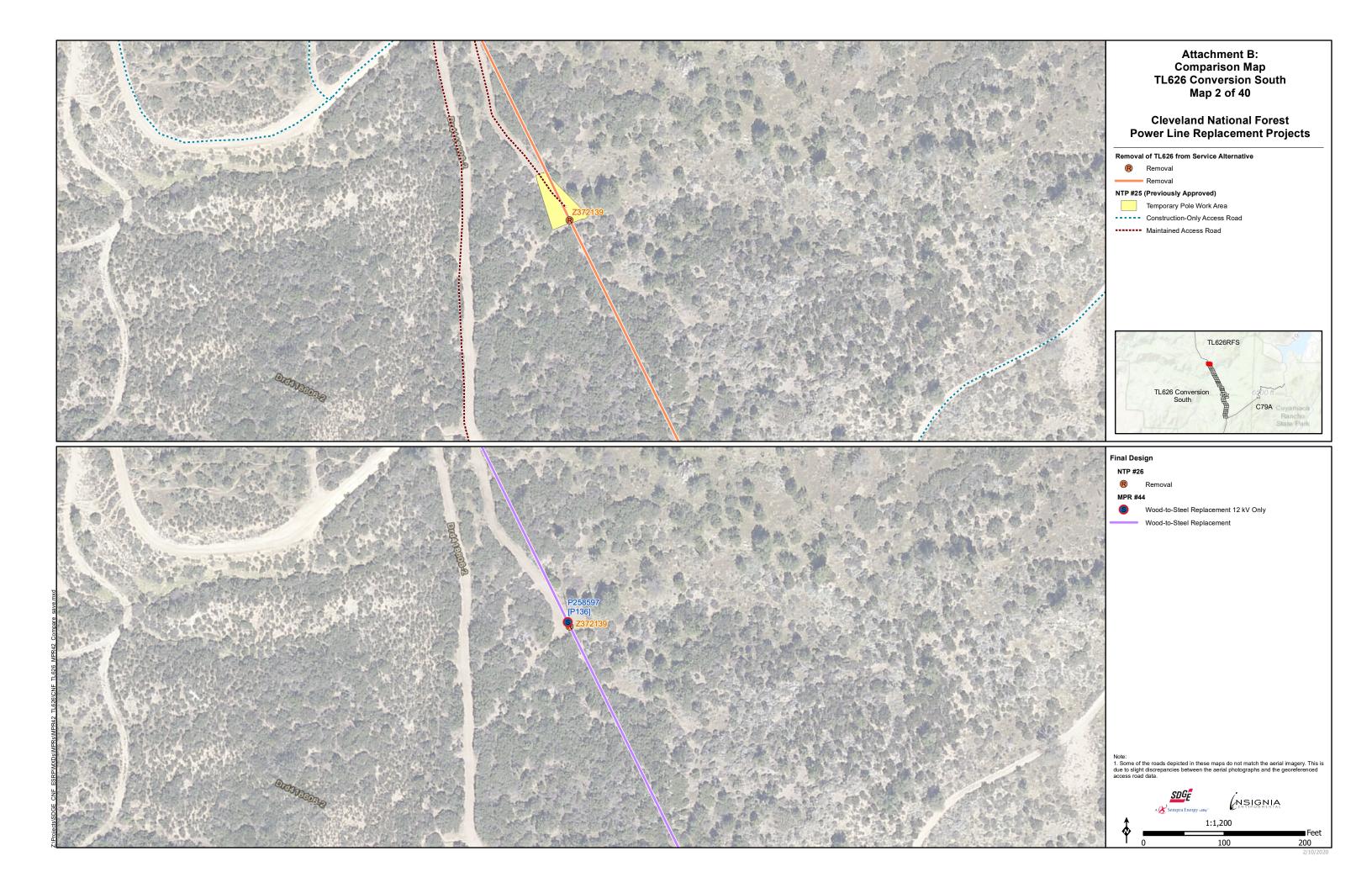
Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:

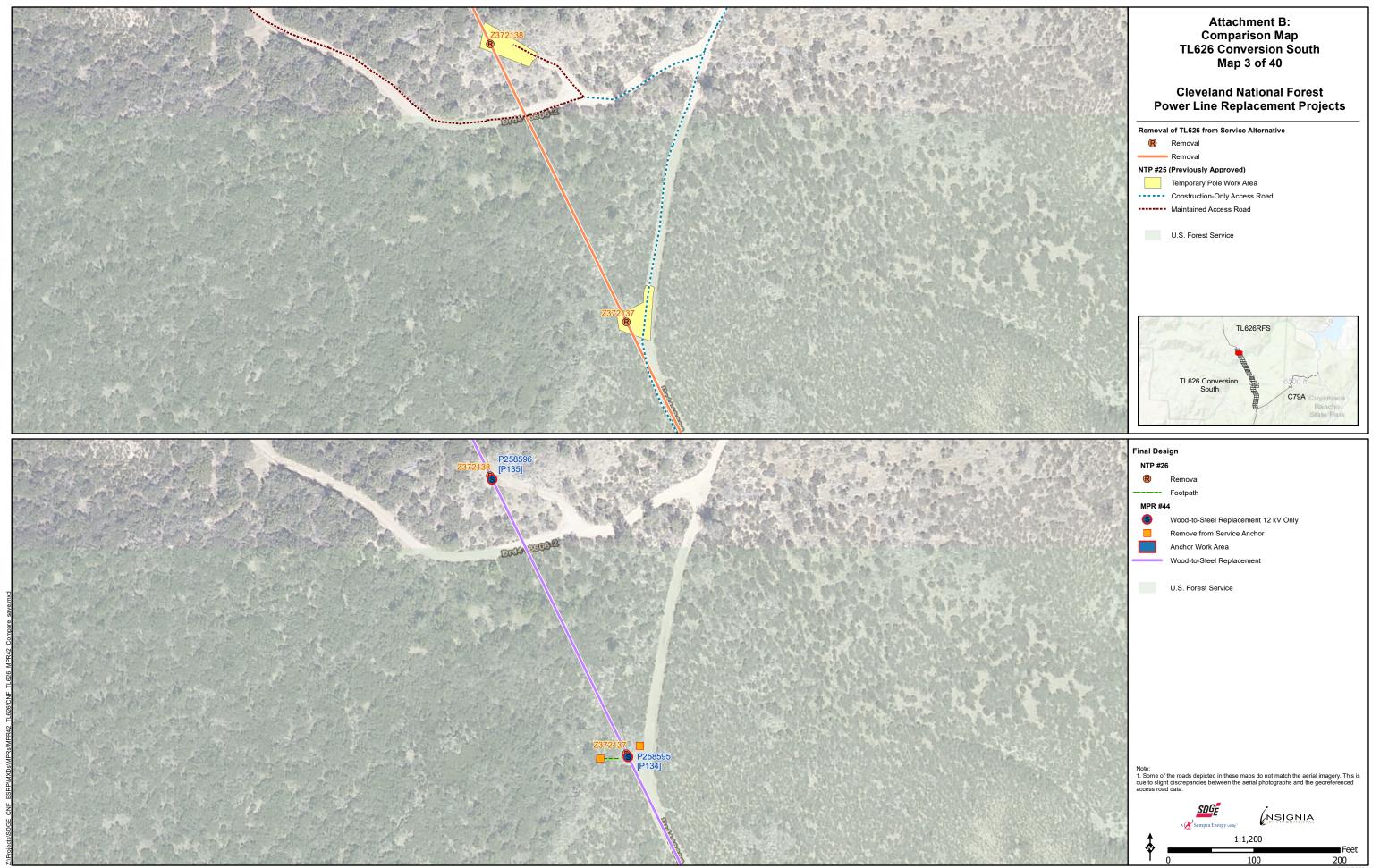
The requested refinements will not require additional or different types of construction vehicles and equipment than those discussed in the Final EIR/EIS. In addition, the total number of truck trips associated with construction of the Project will not significantly change, and the use of the requested refinements will affect the same roadways analyzed in the Final EIR/EIS (i.e., Boulder Creek Road), as well as some 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)¹⁸ 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.

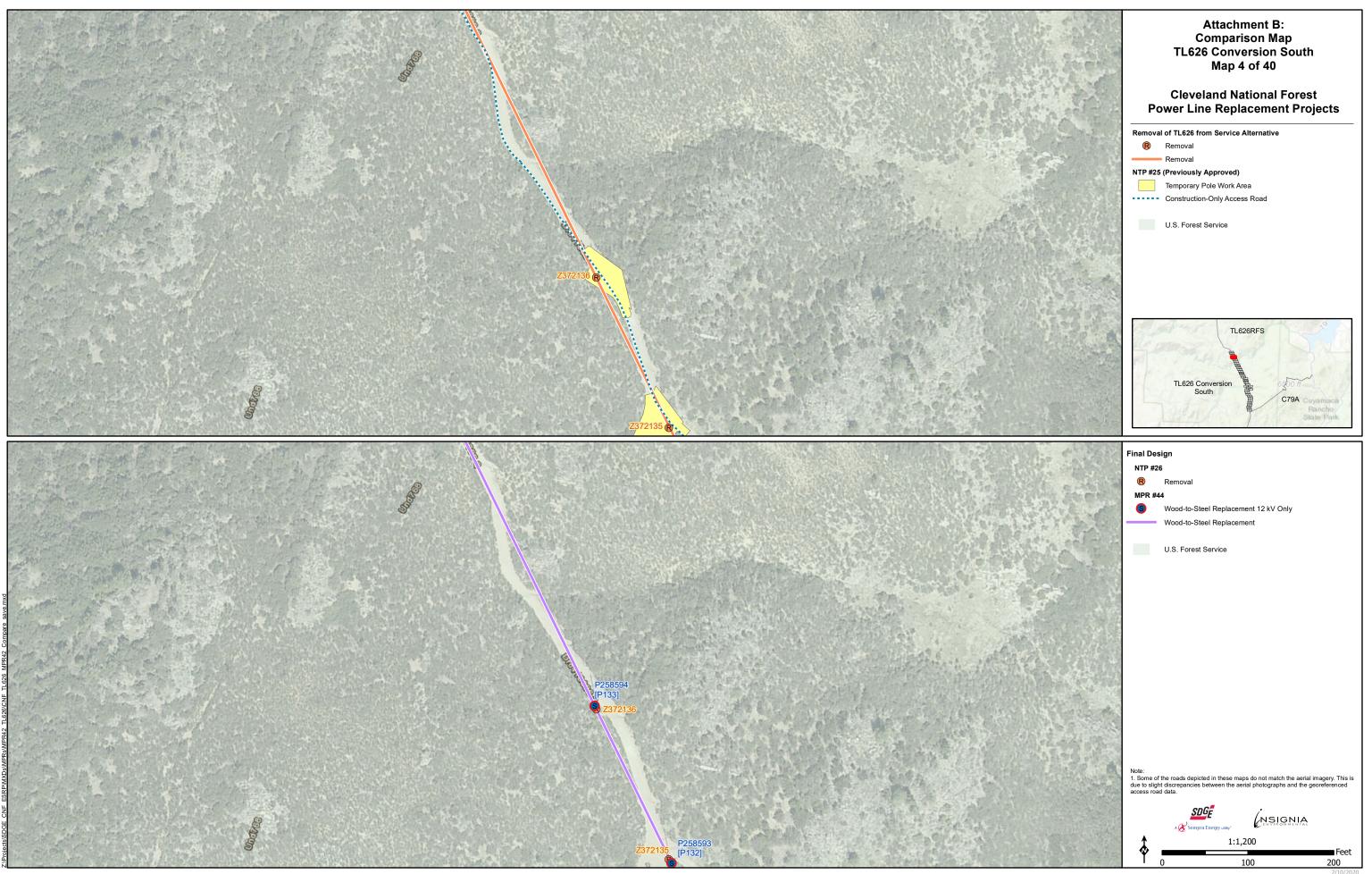
¹⁸ Boulder Creek Road has an LOS of A through C; an LOS does not exist for smaller public and private roads.

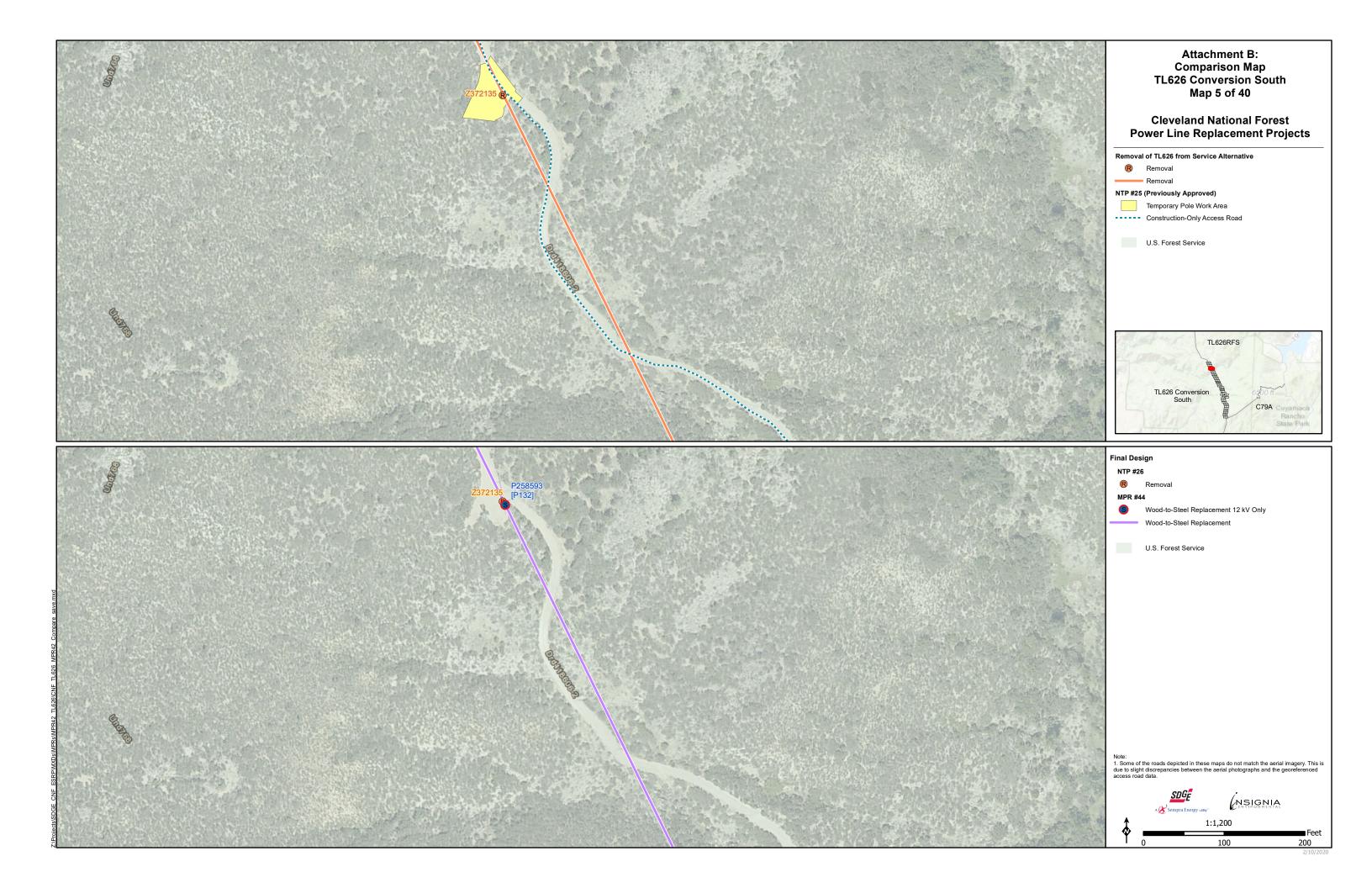
ATTACHMENT B: COMPARISON MAP

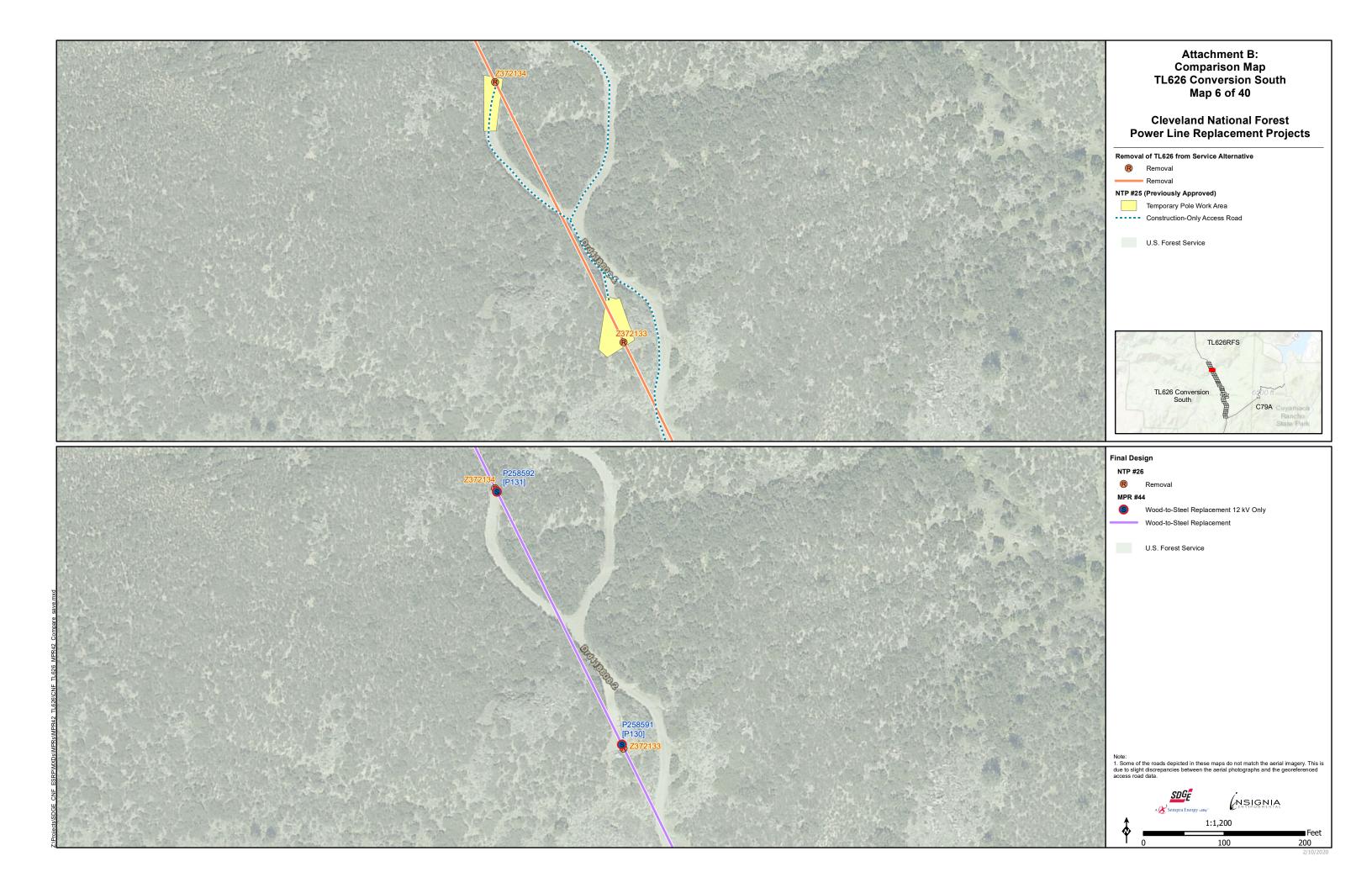


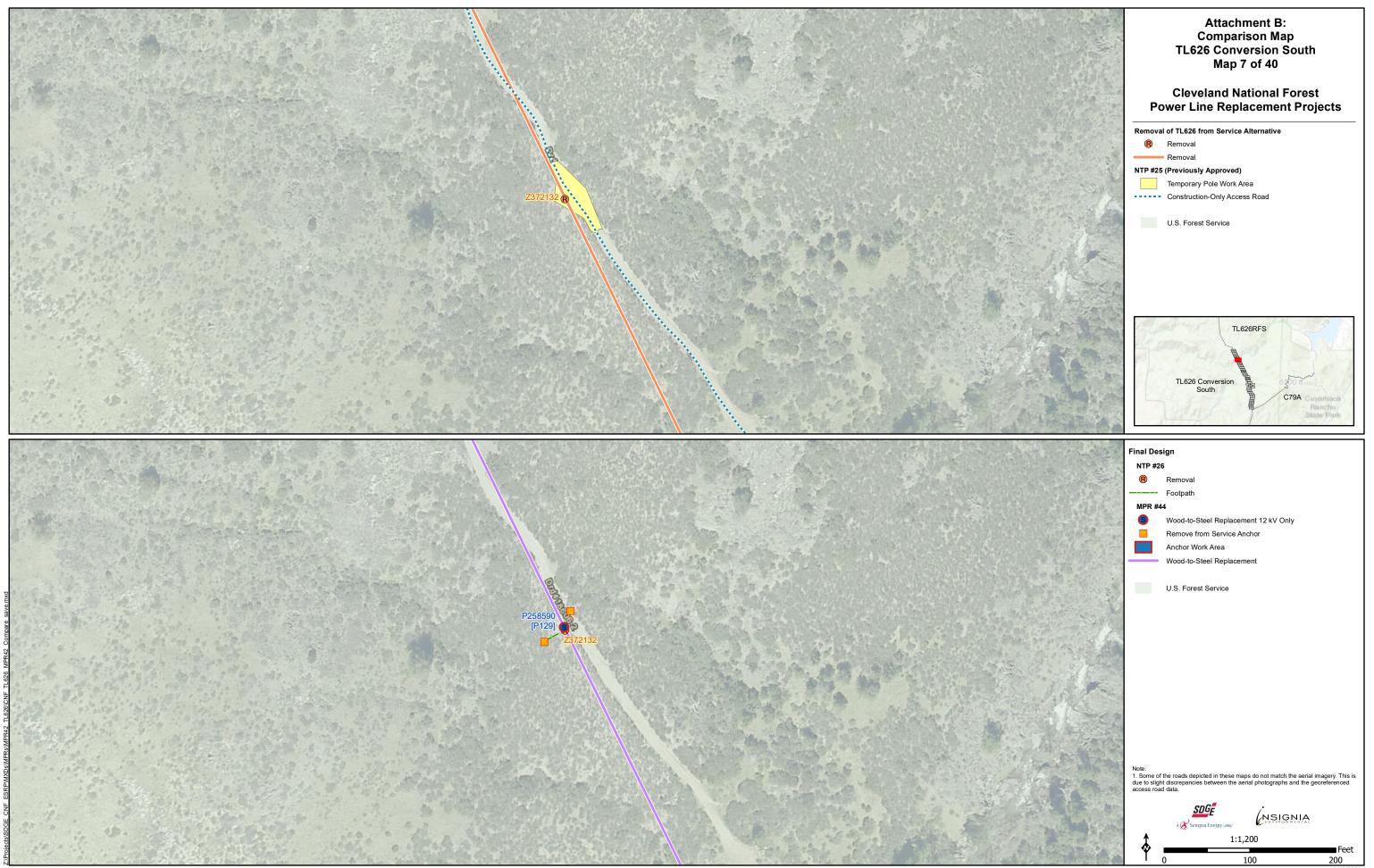




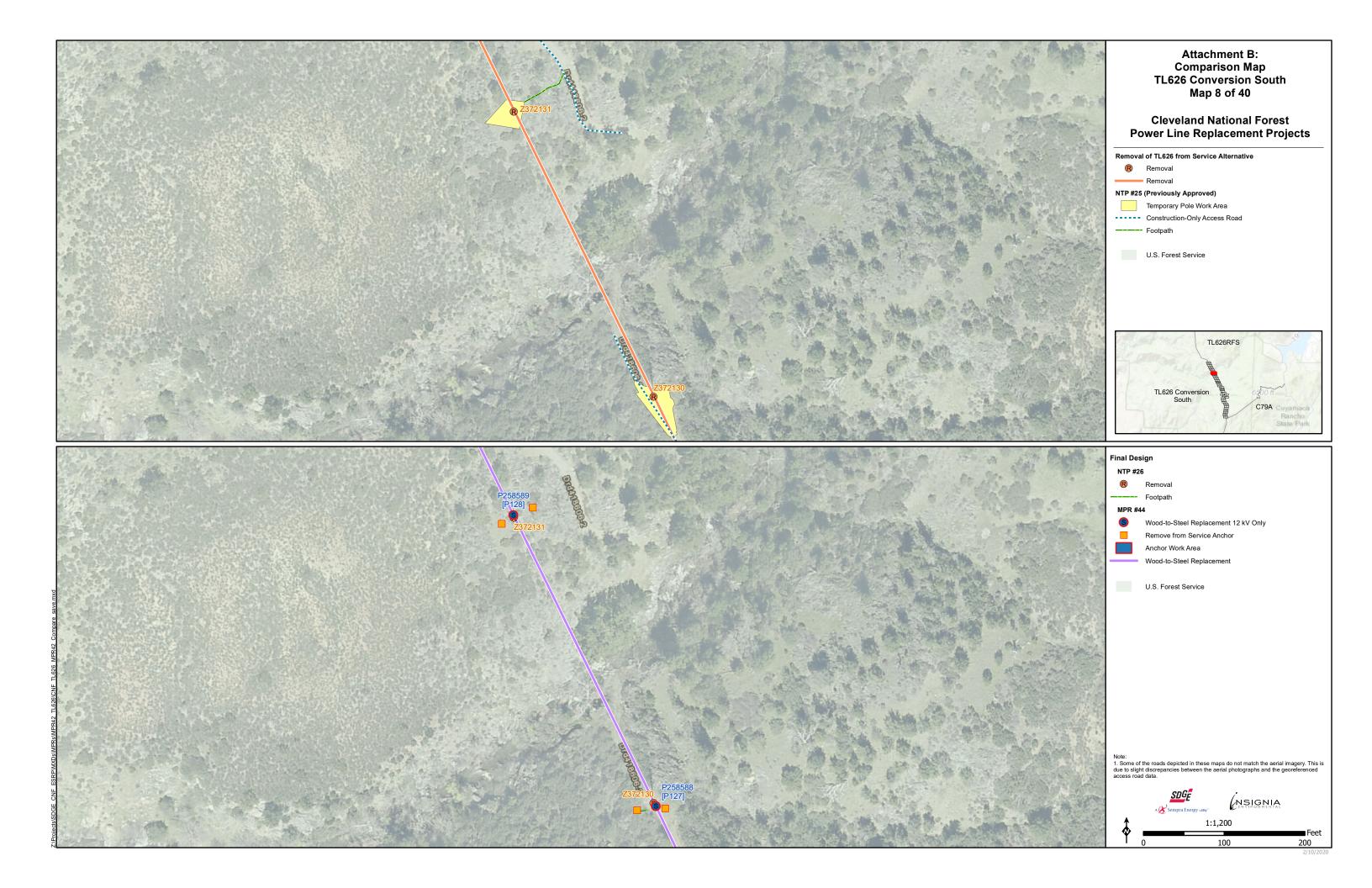


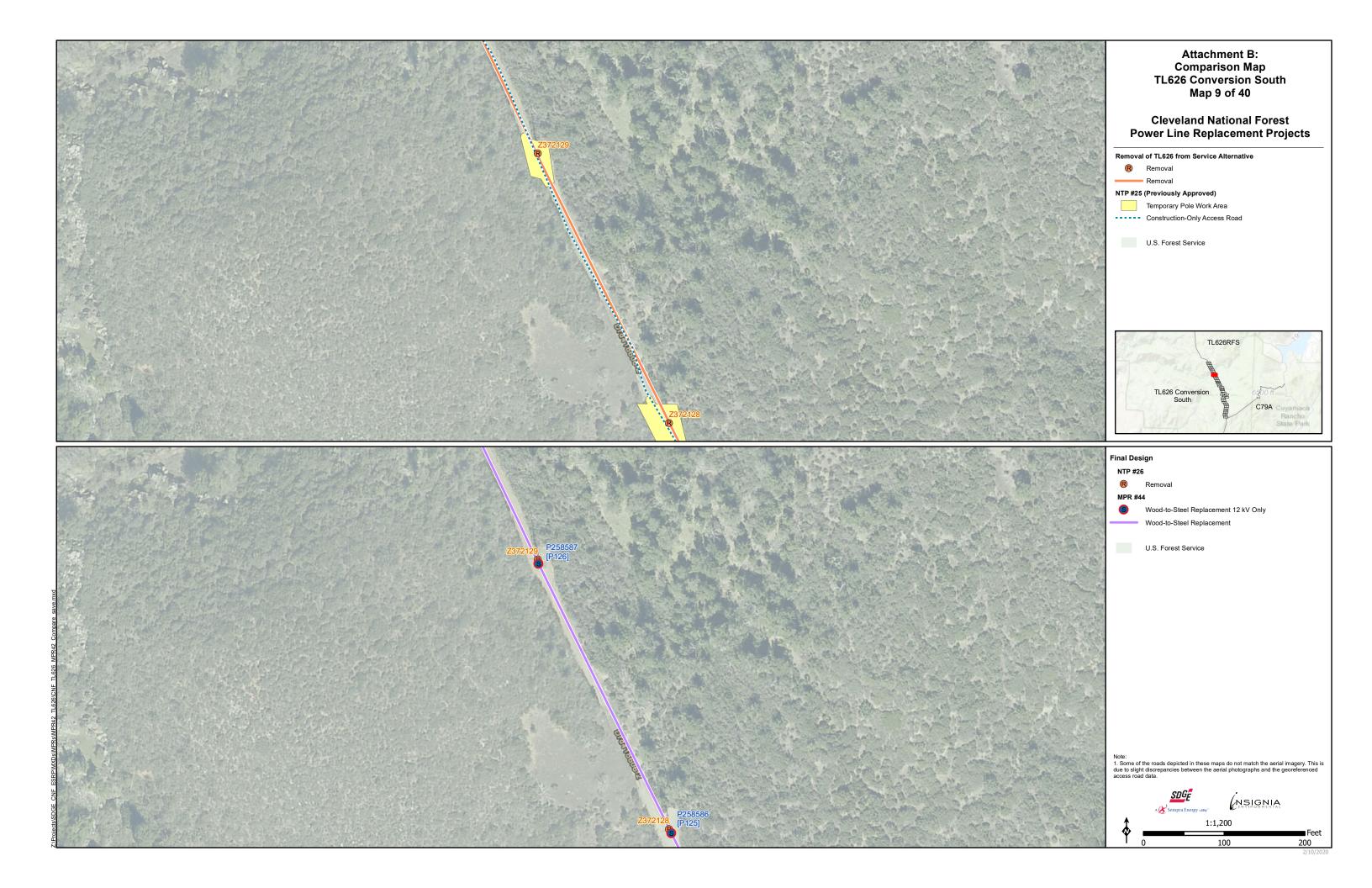


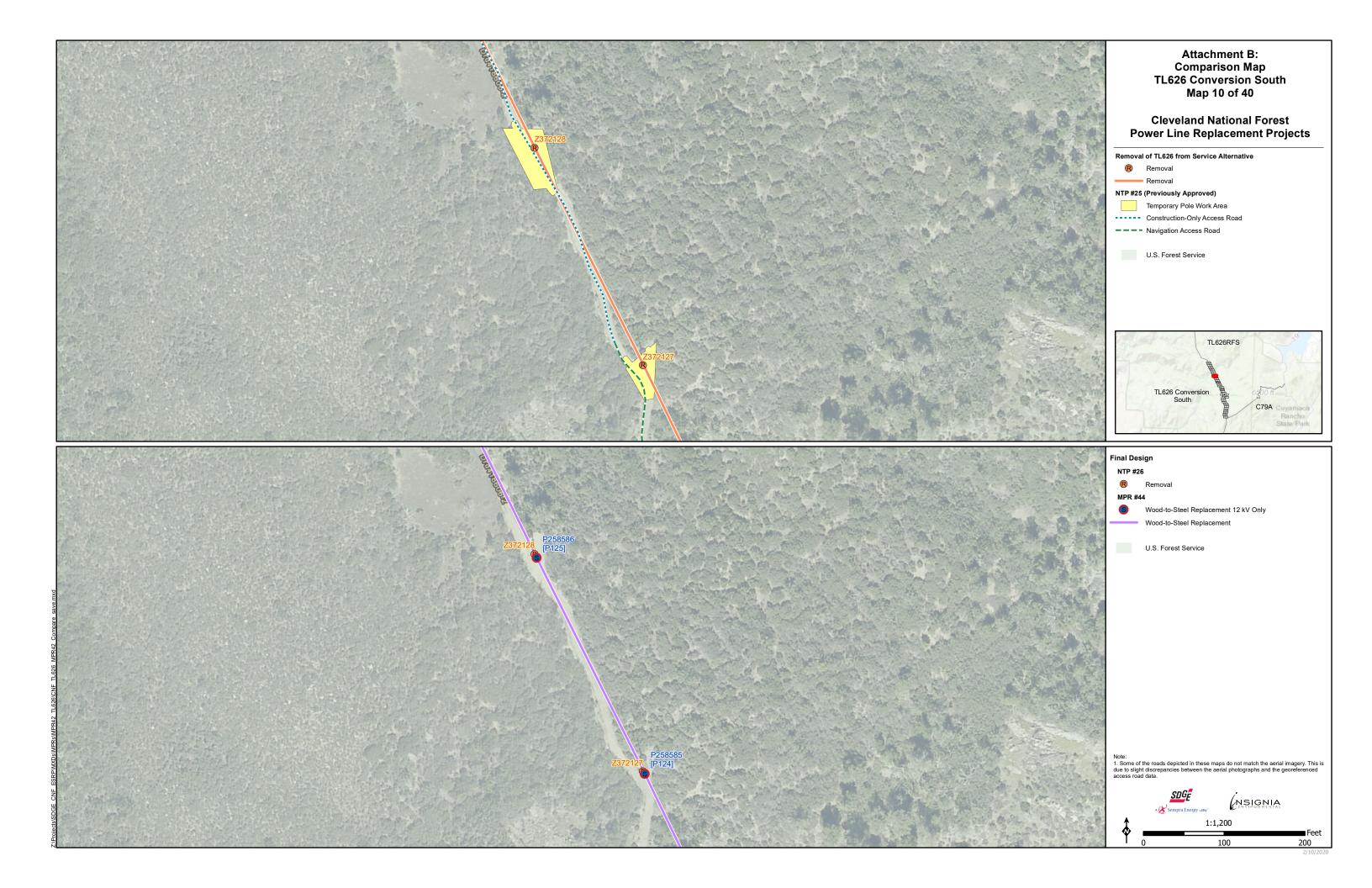


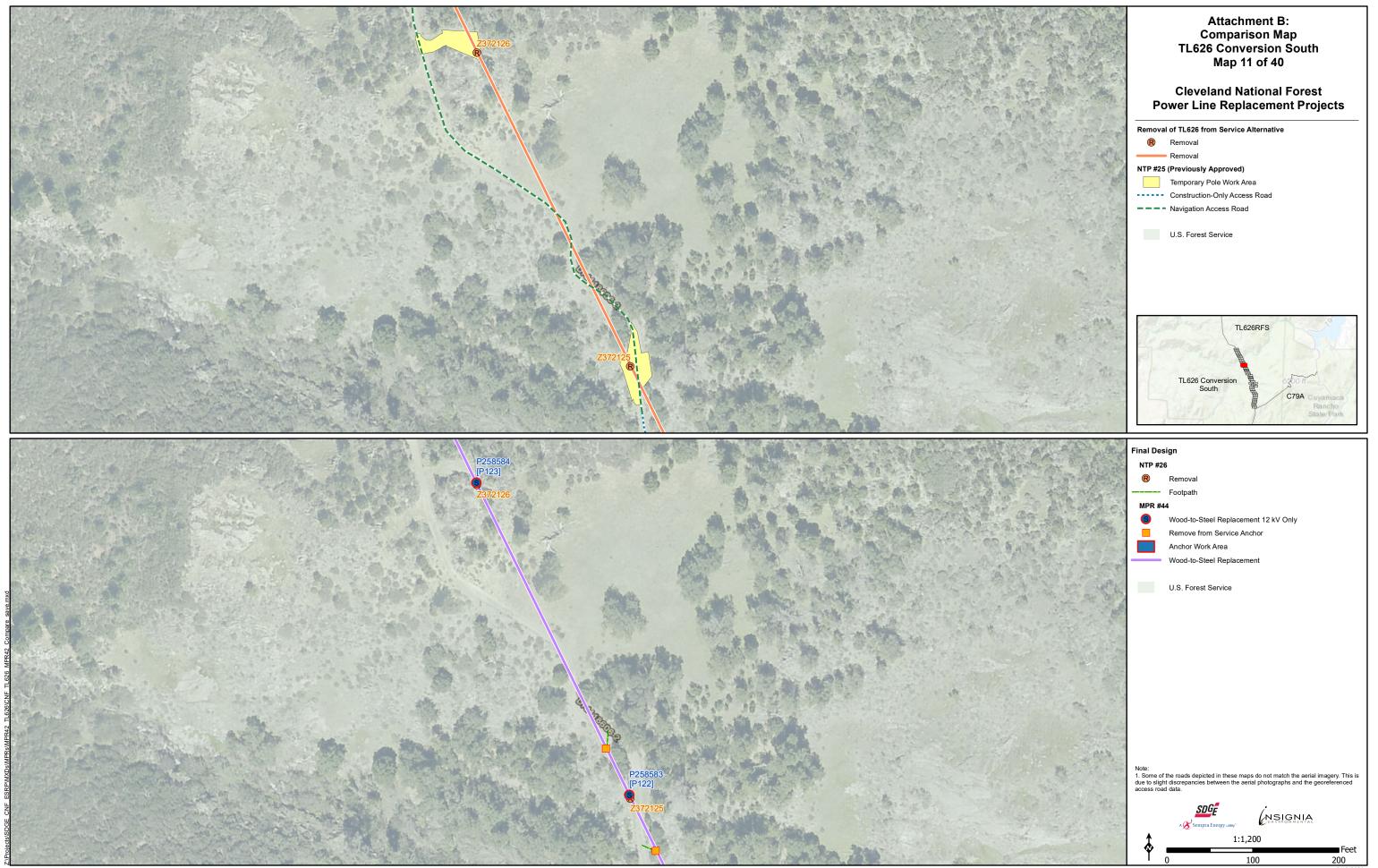


^{2/10/2020}

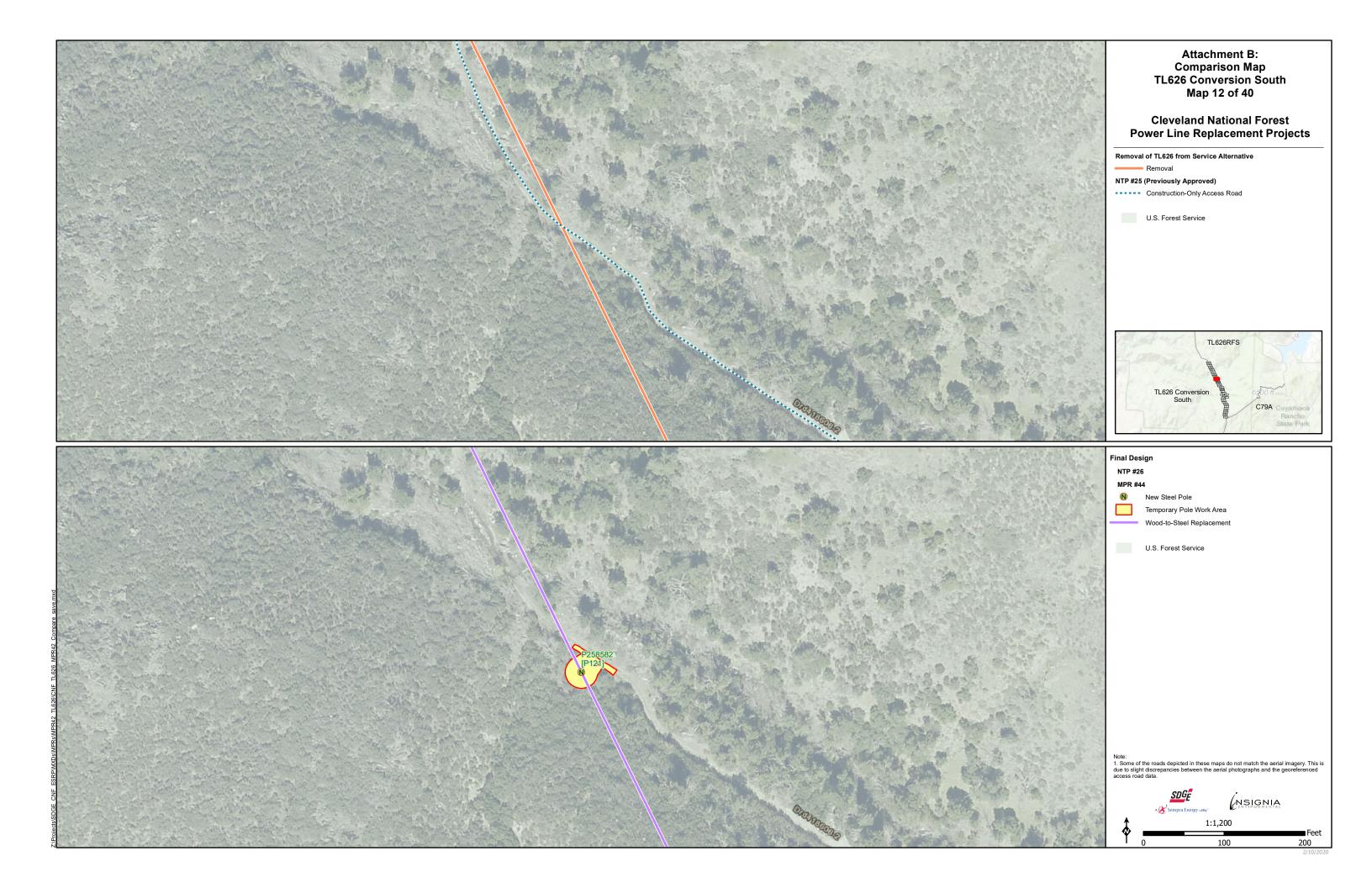


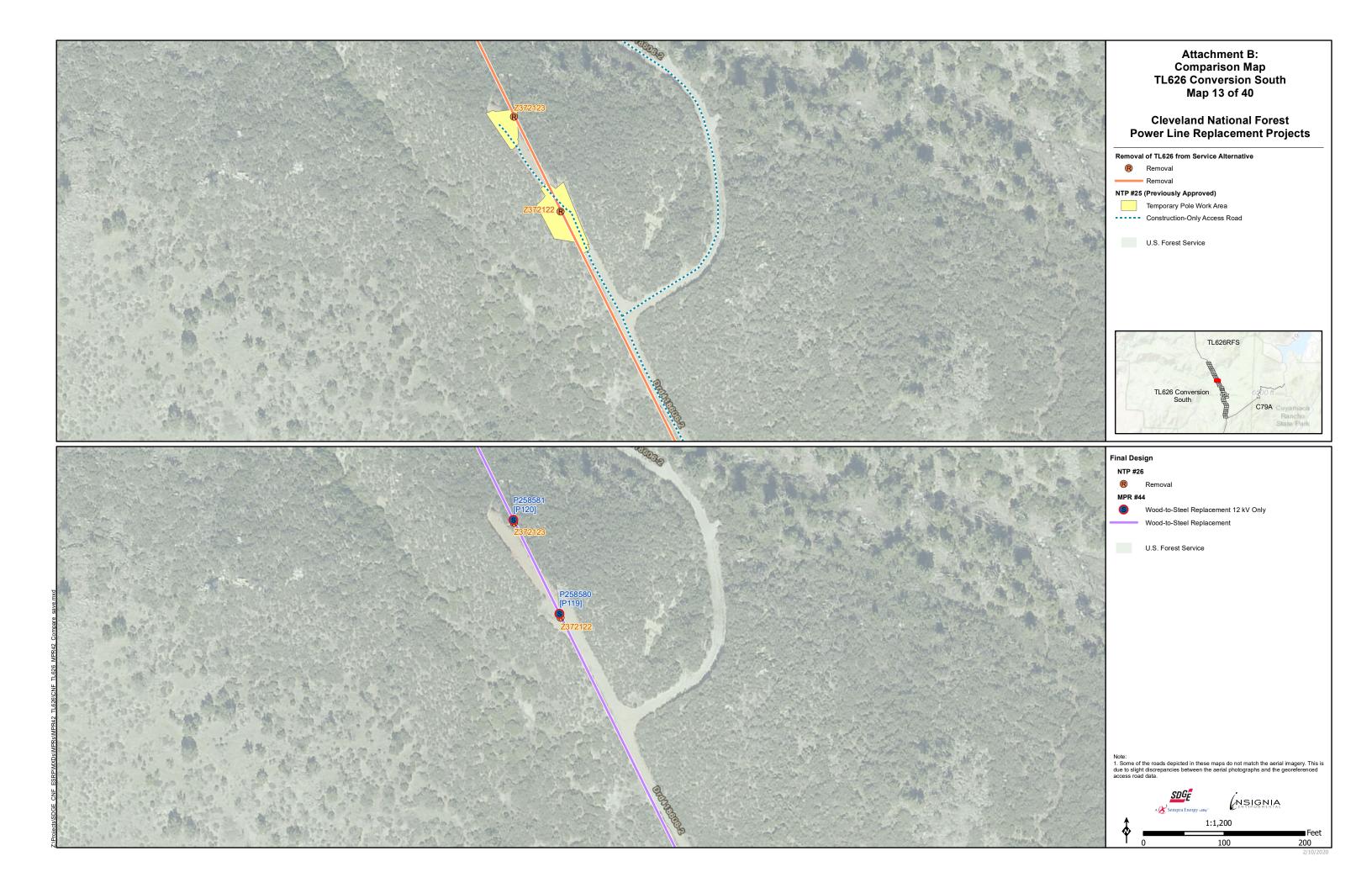


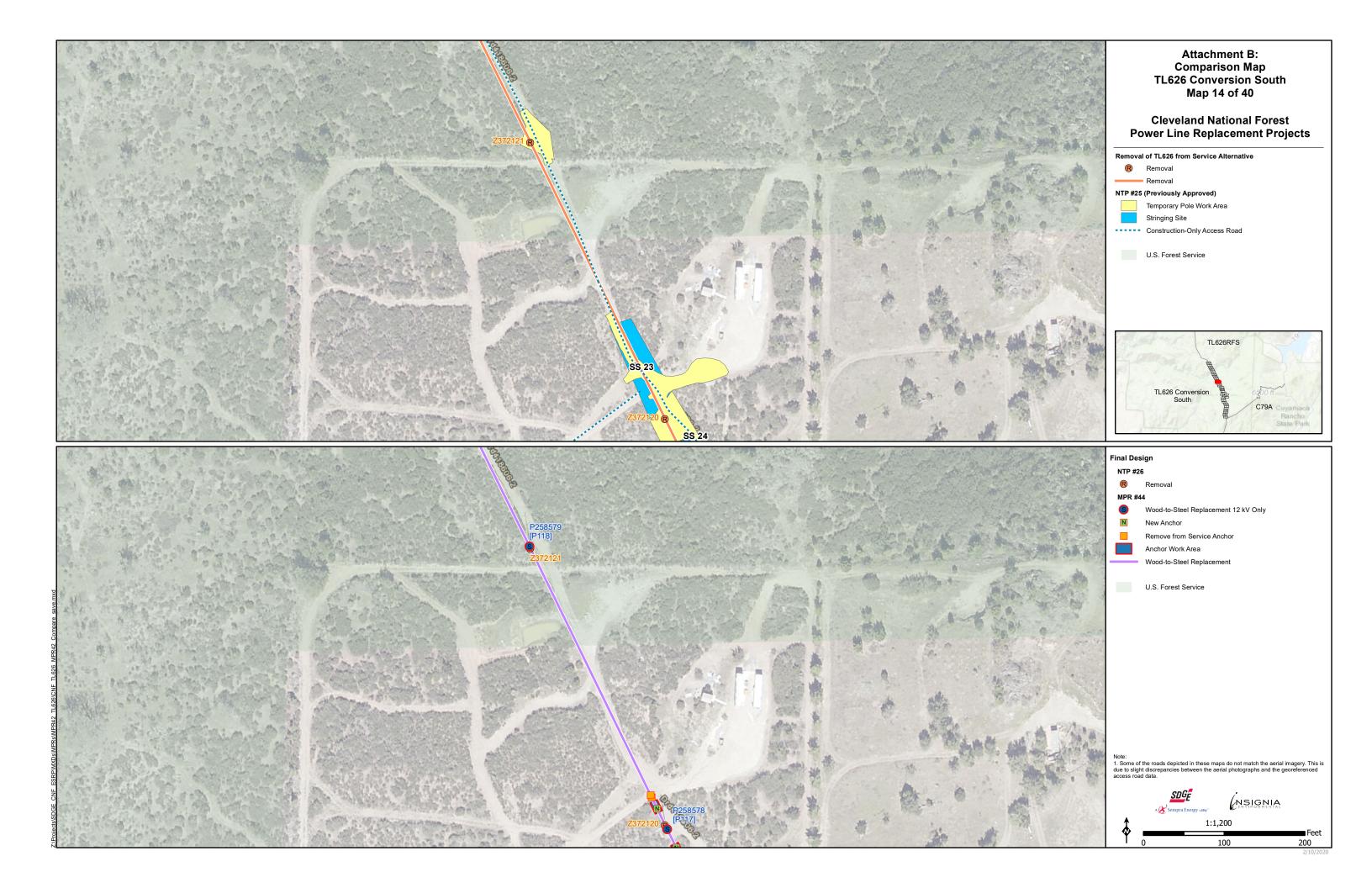




^{2/10/2020}



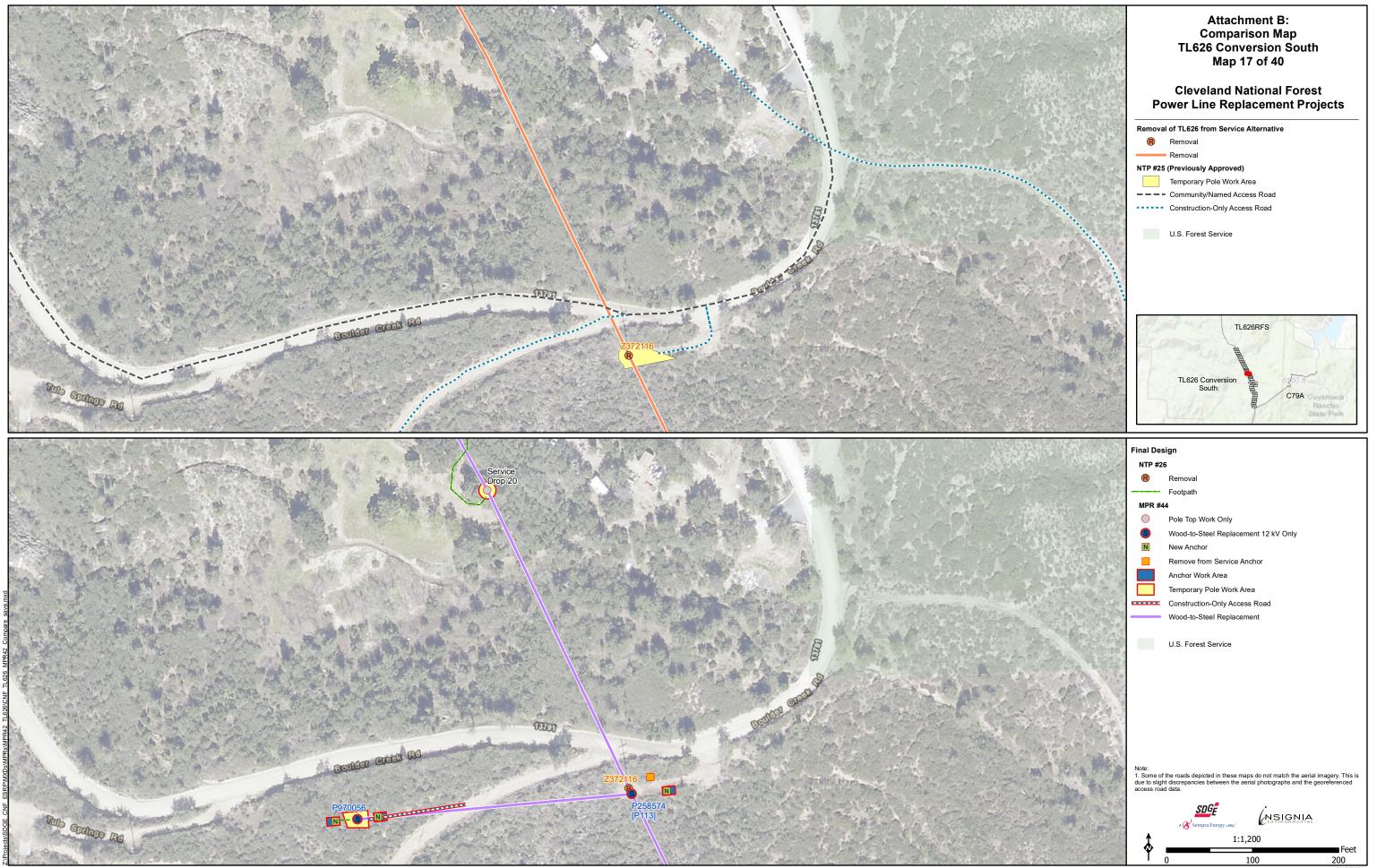




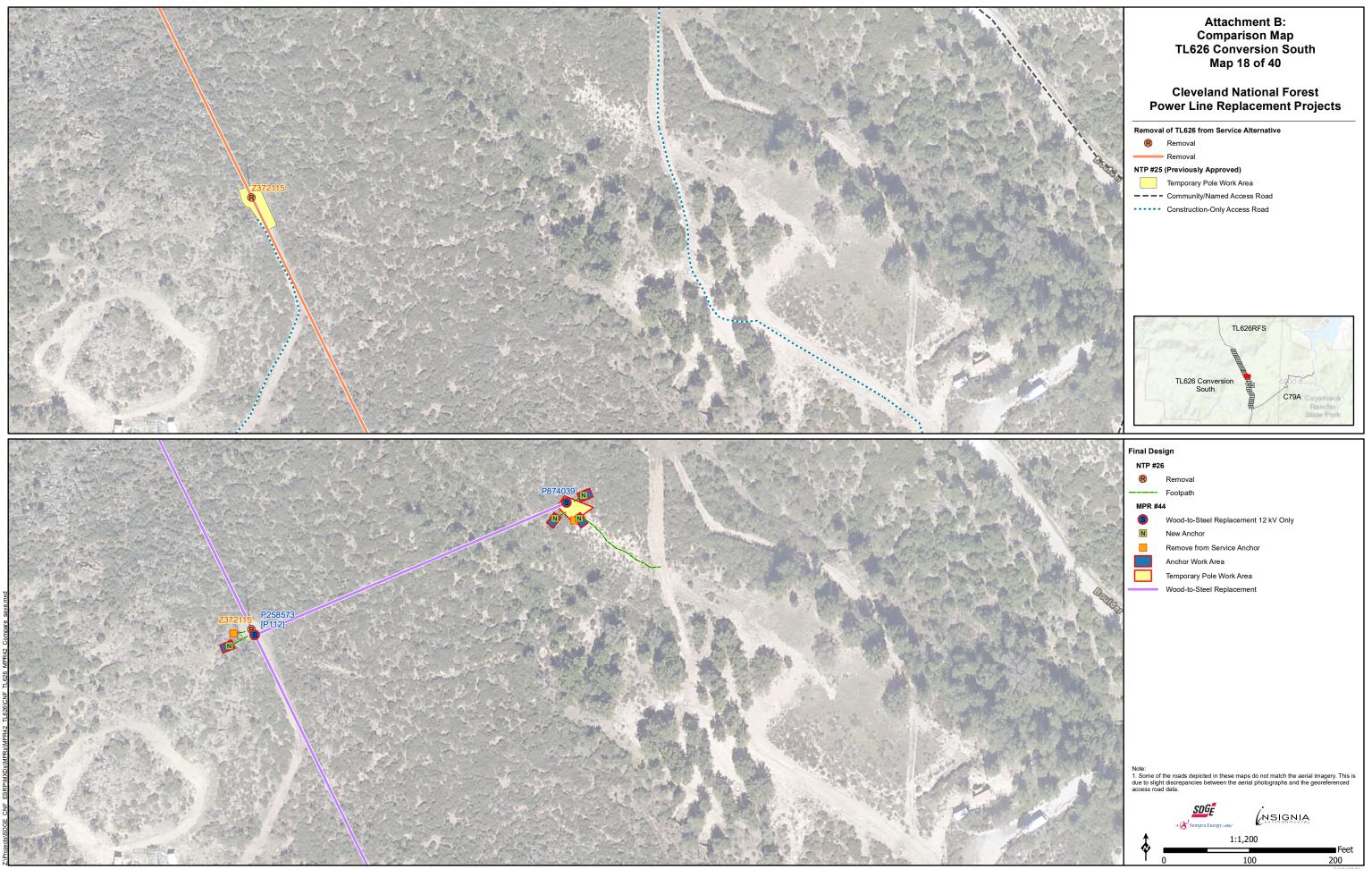


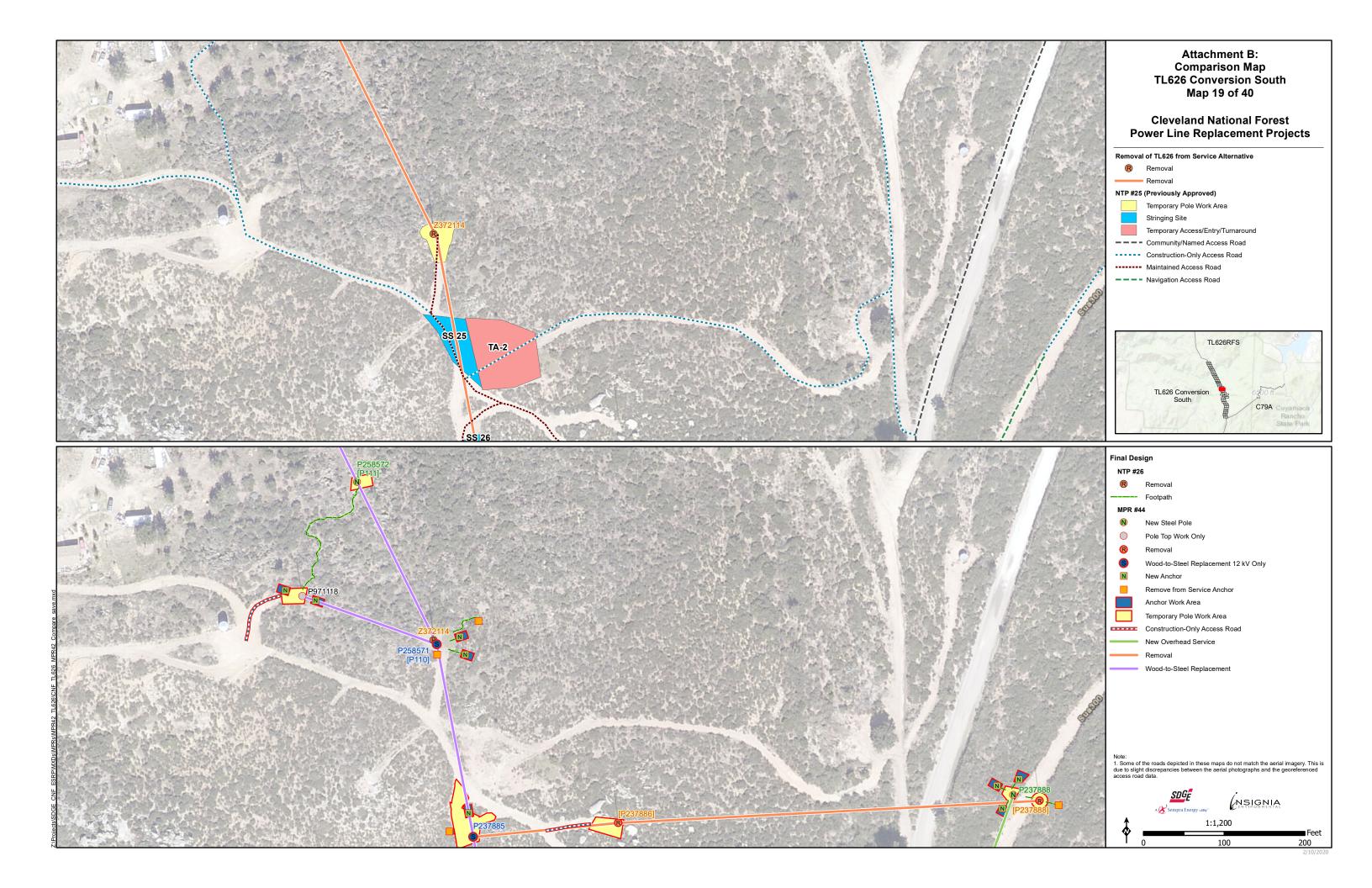


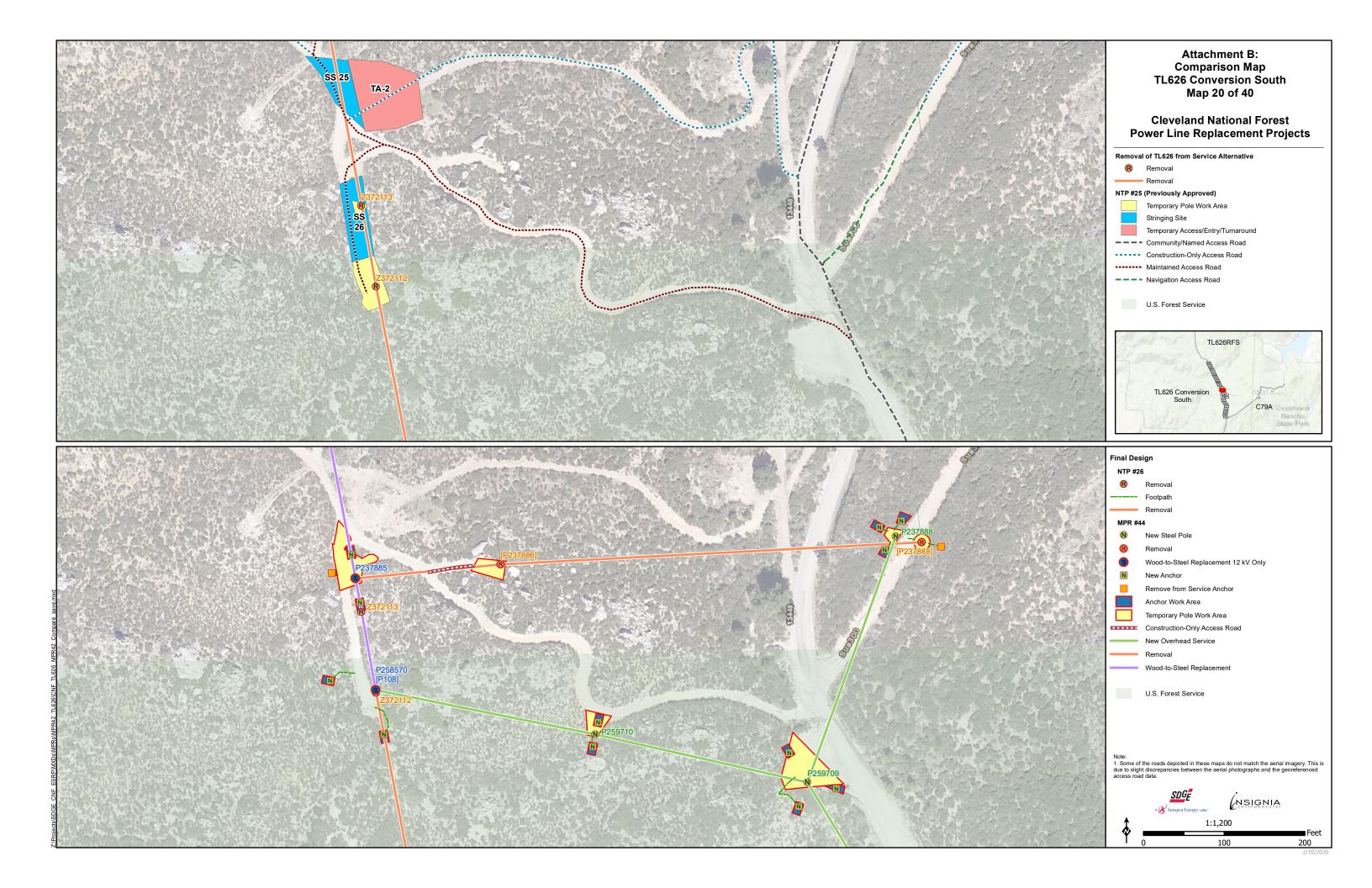
^{2/10/2020}

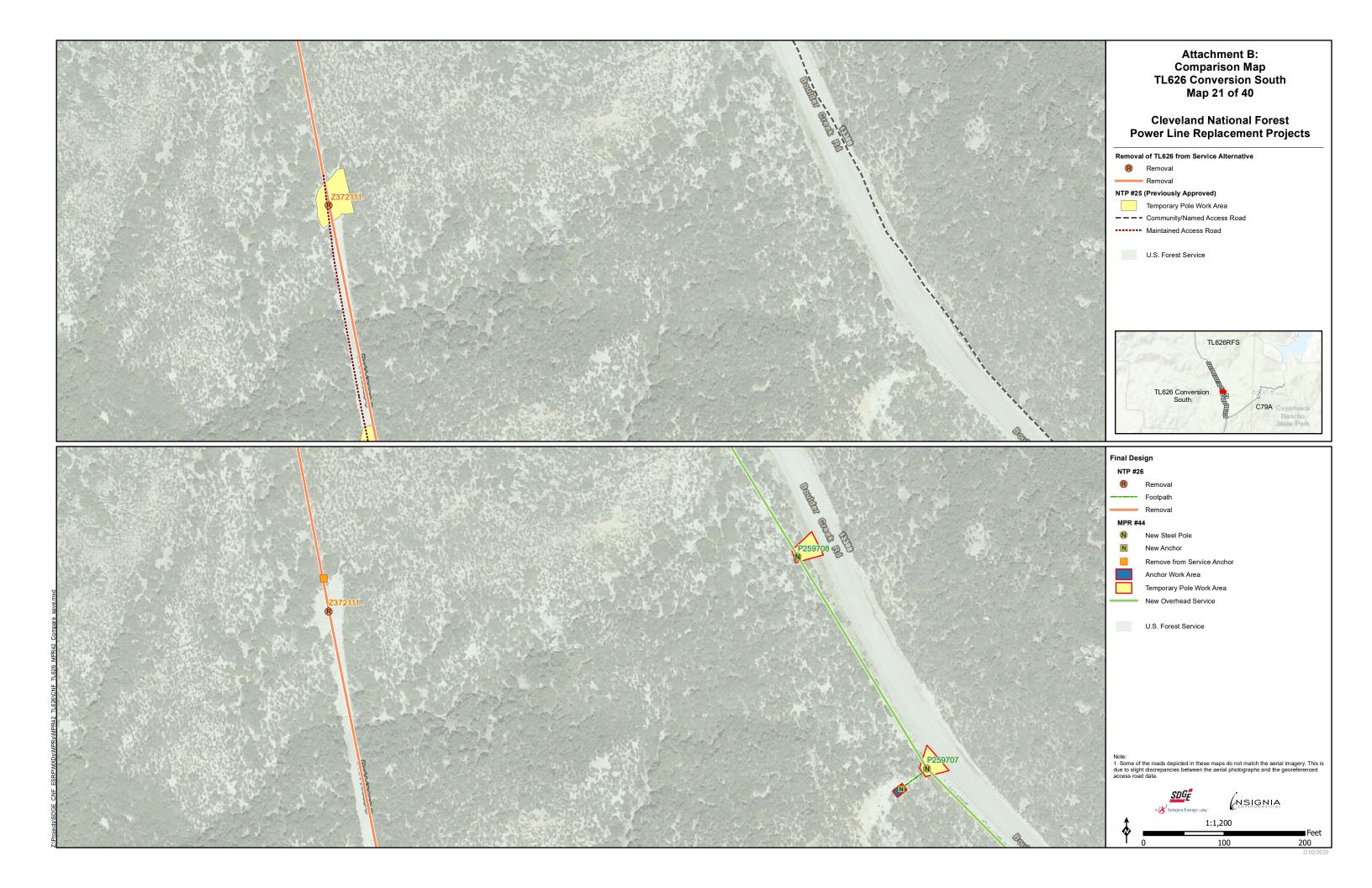


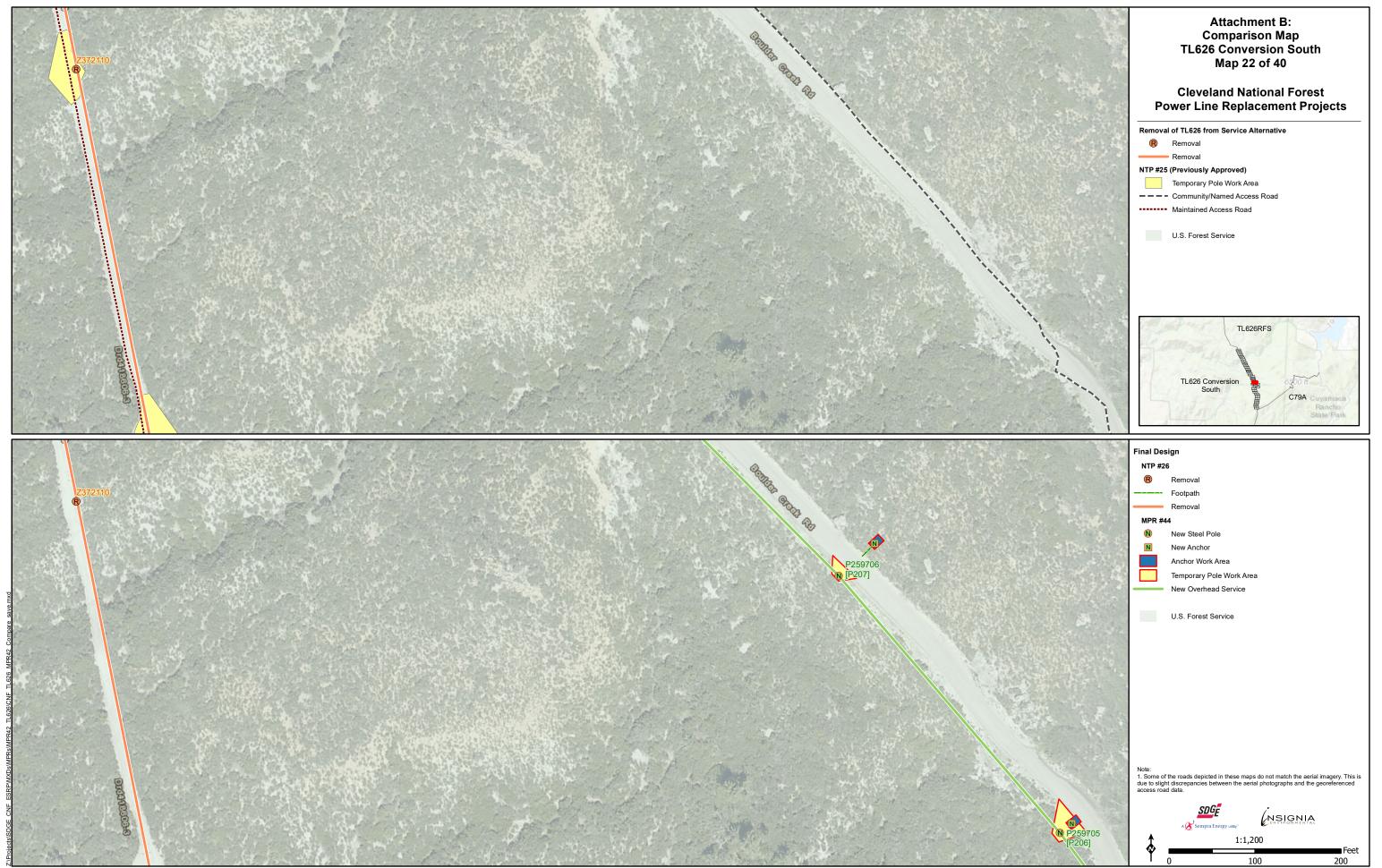
^{2/10/2020}

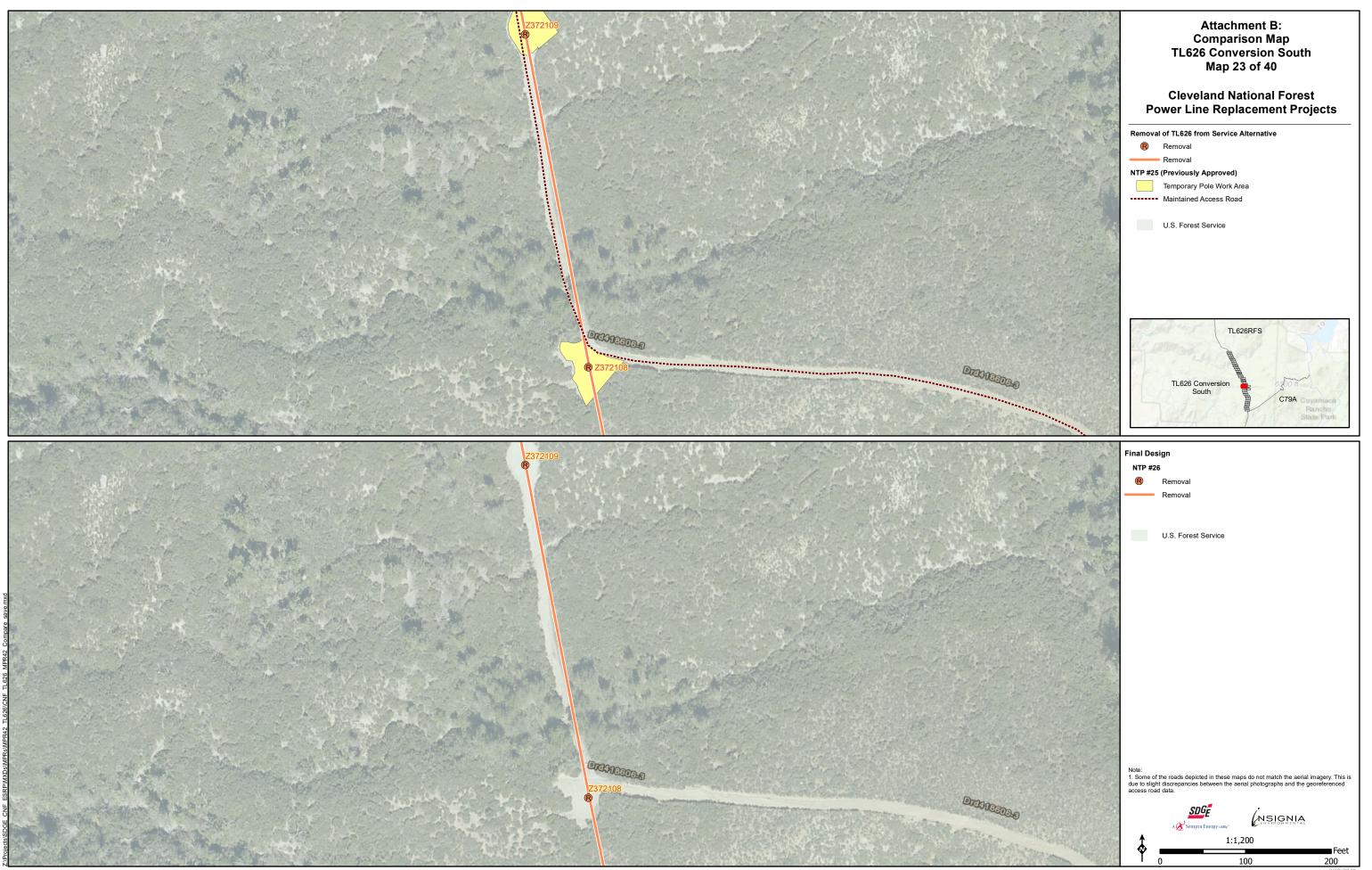


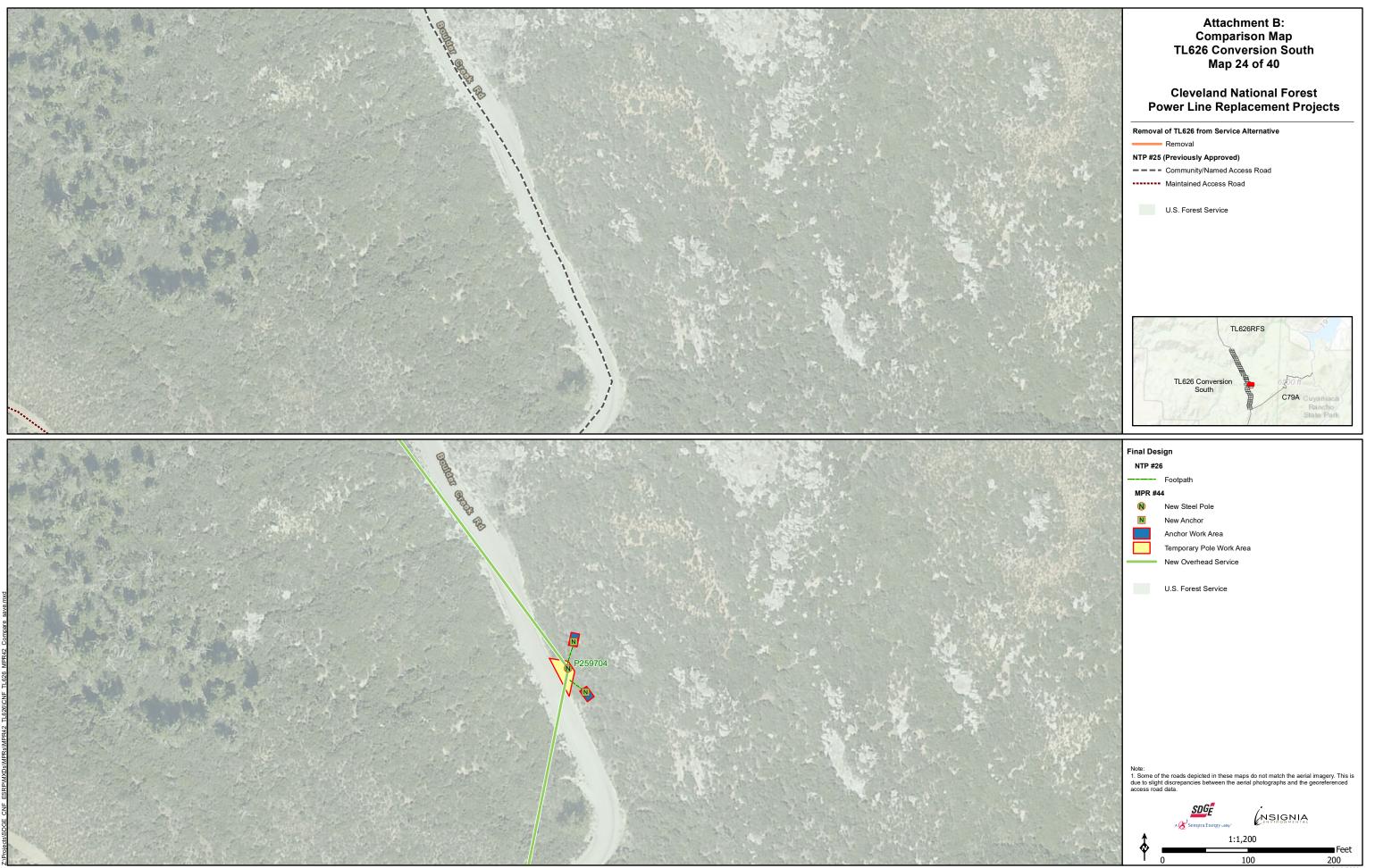




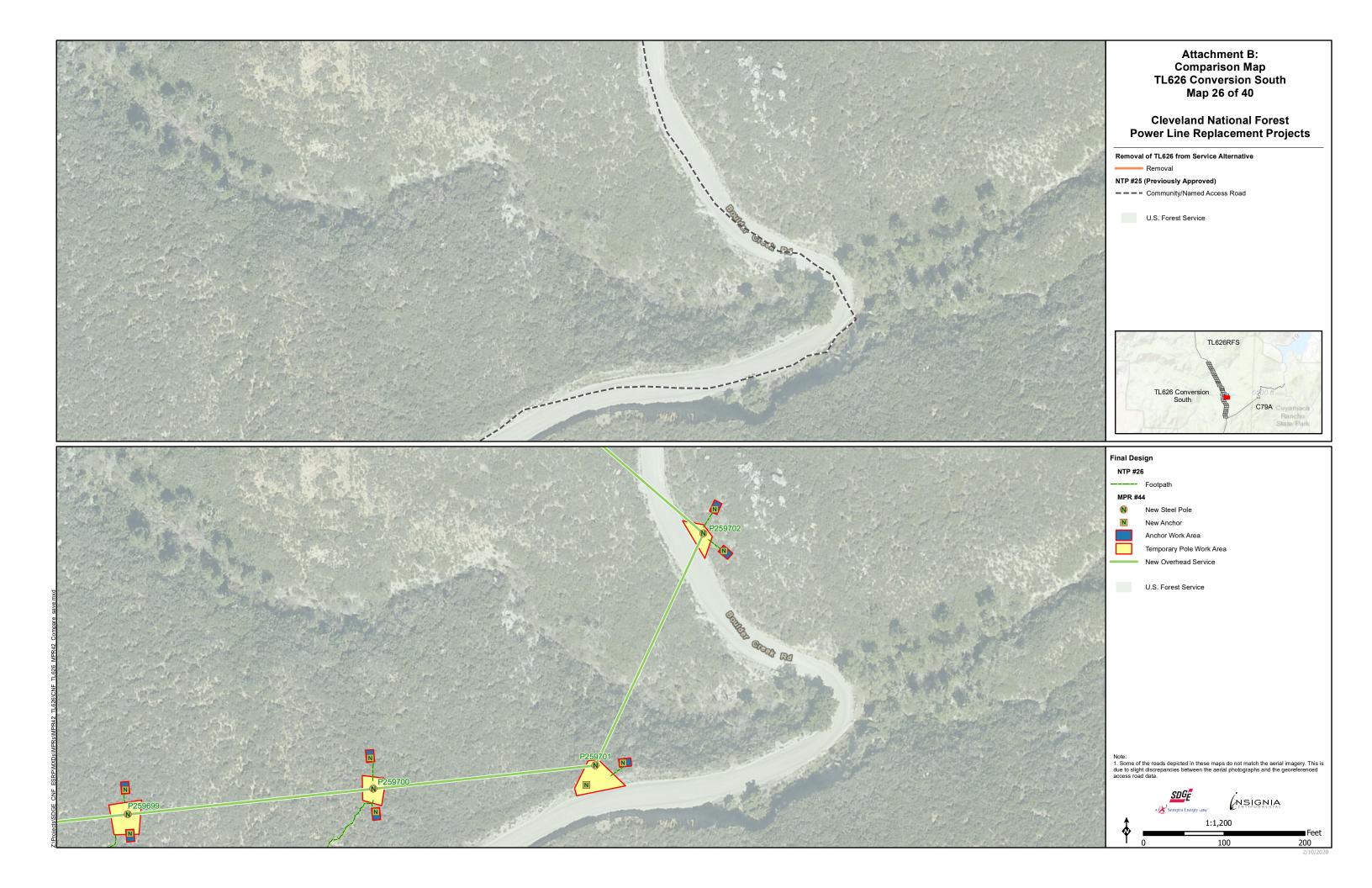




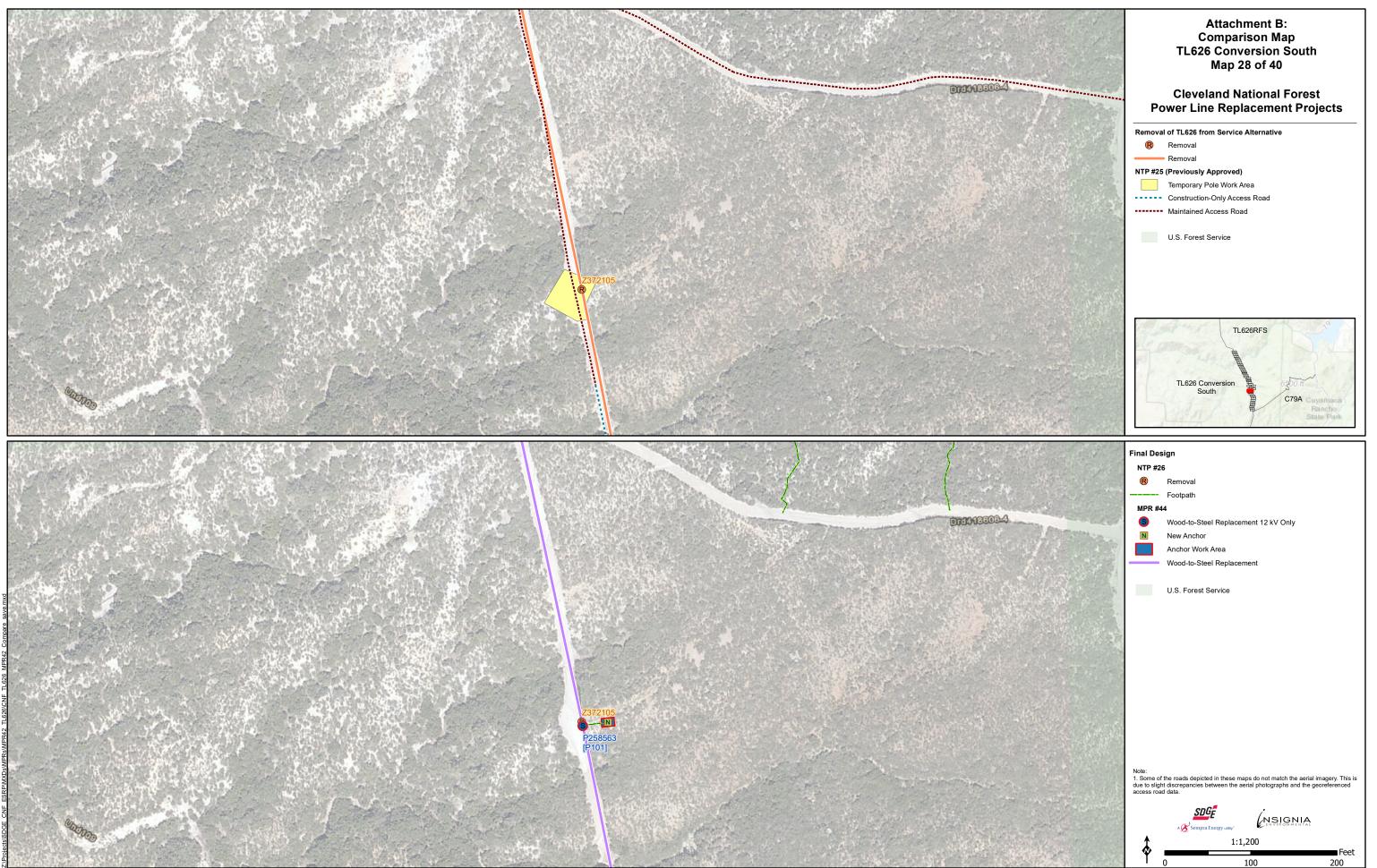


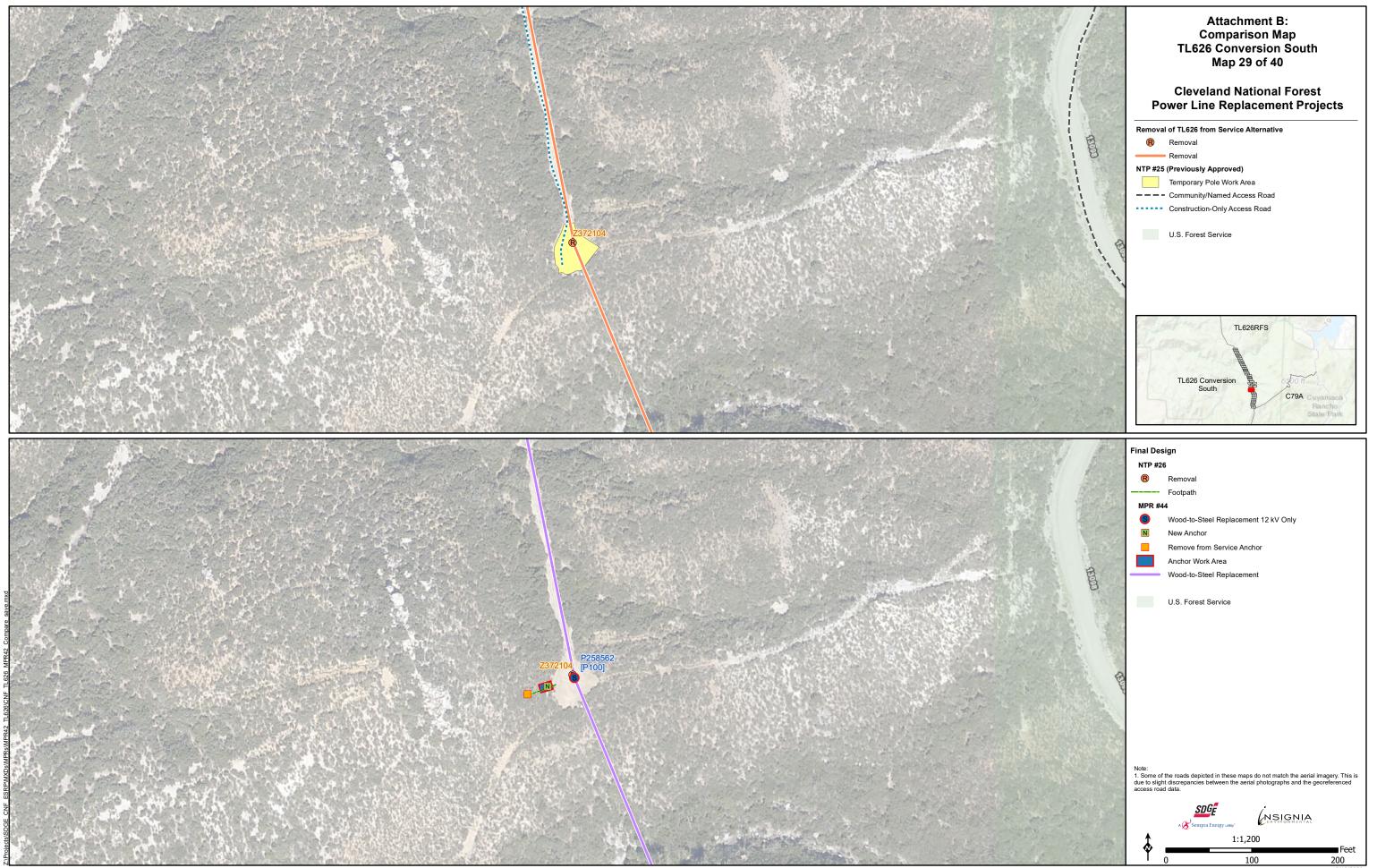




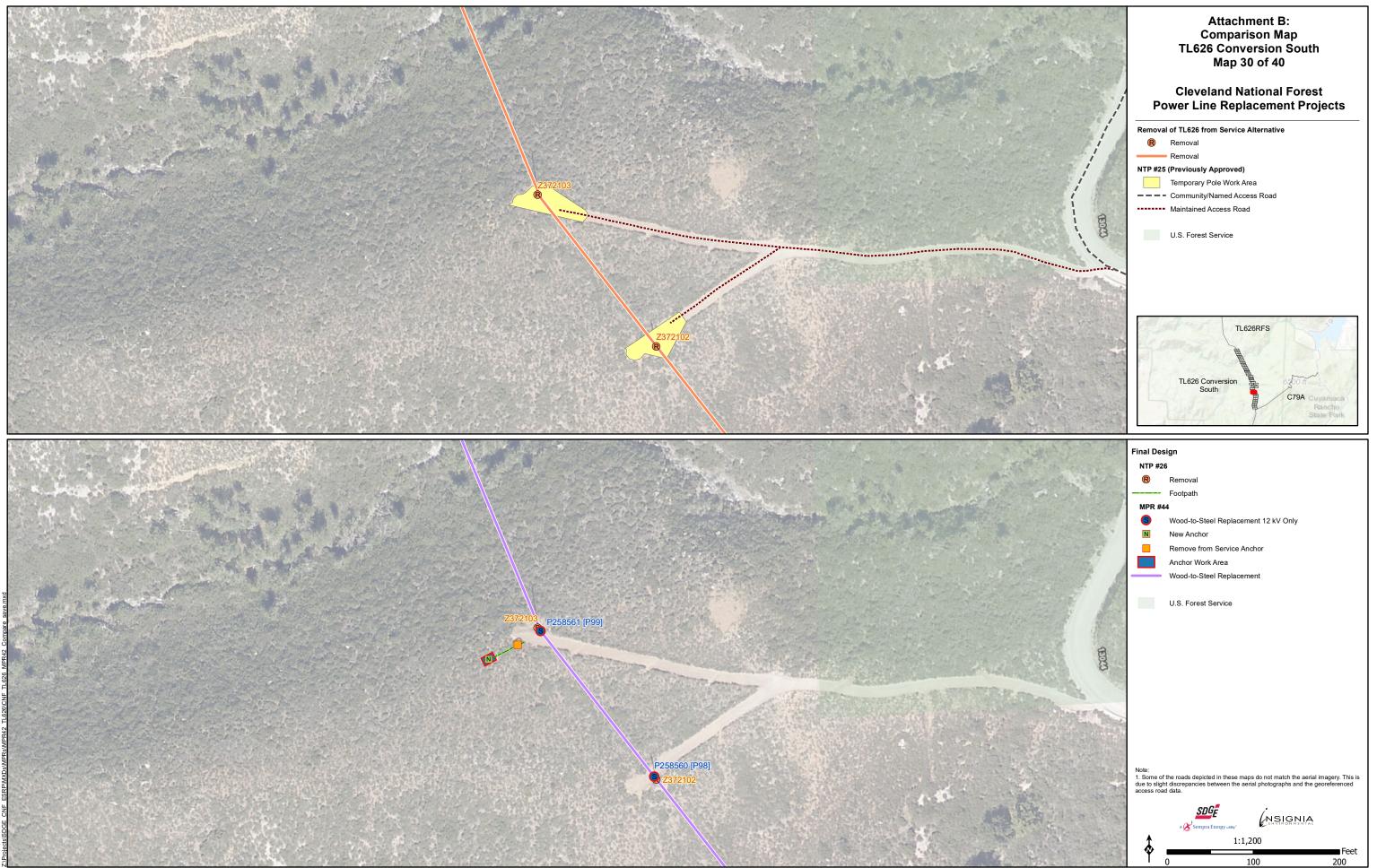


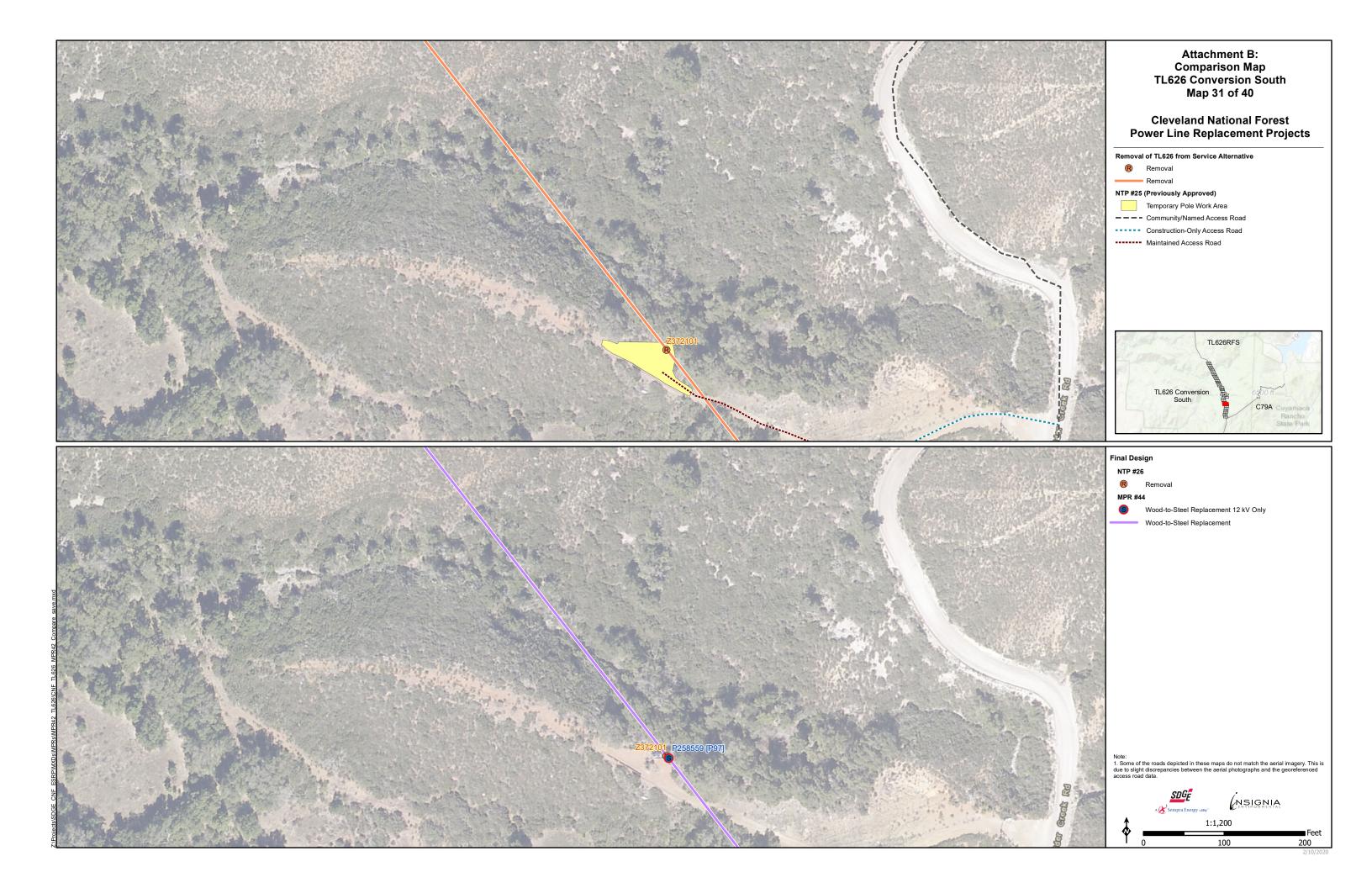




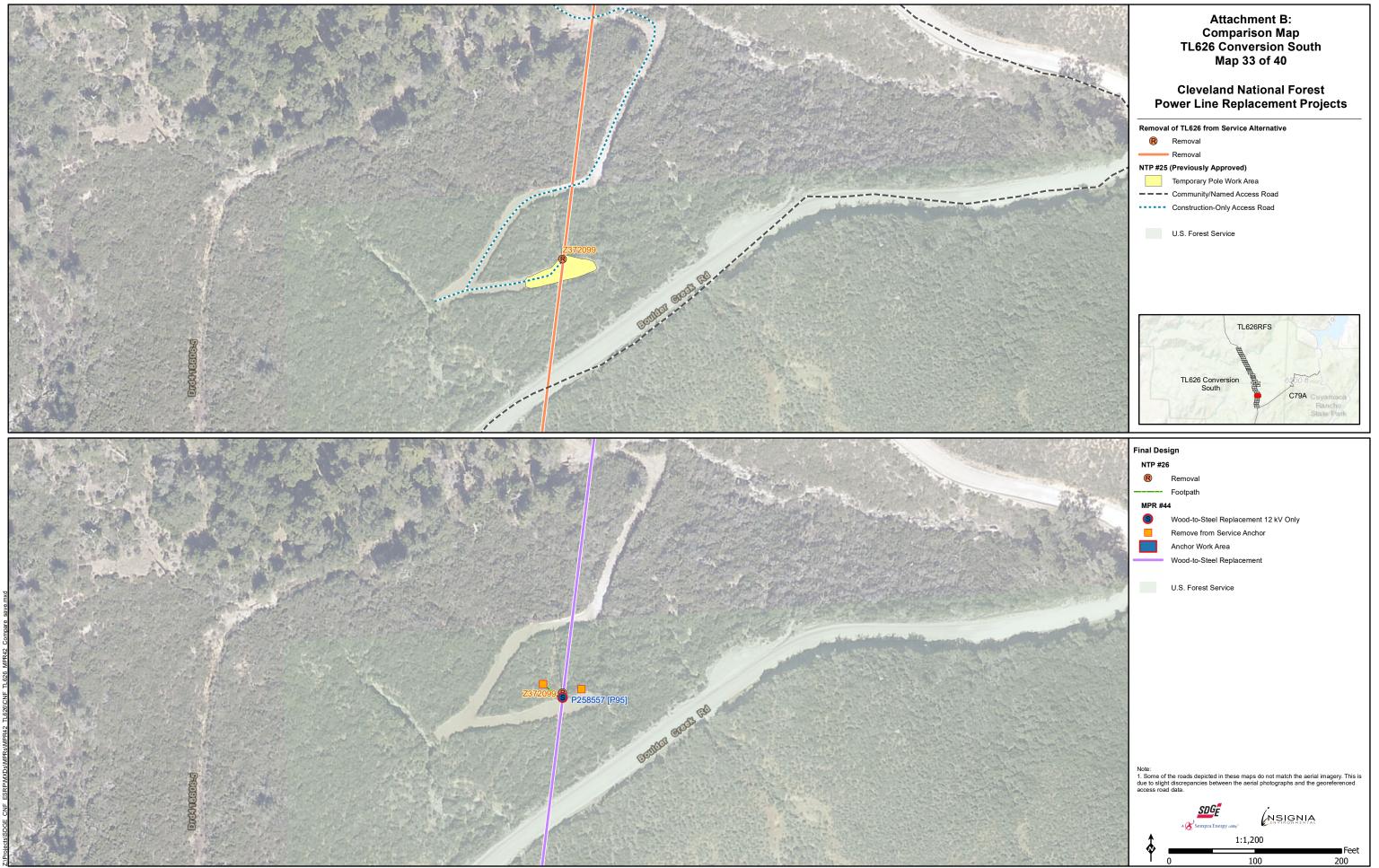


^{2/10/2020}



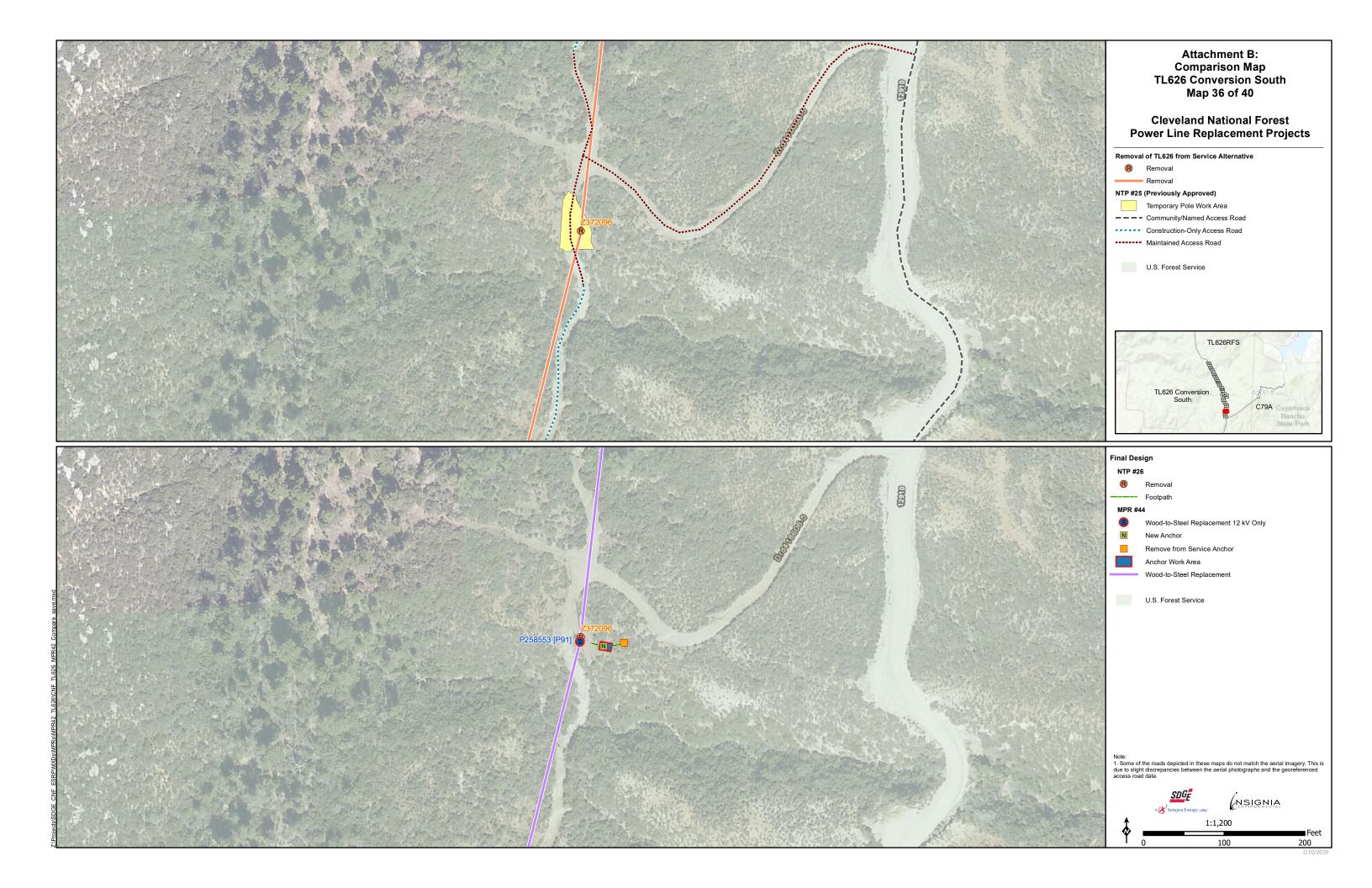




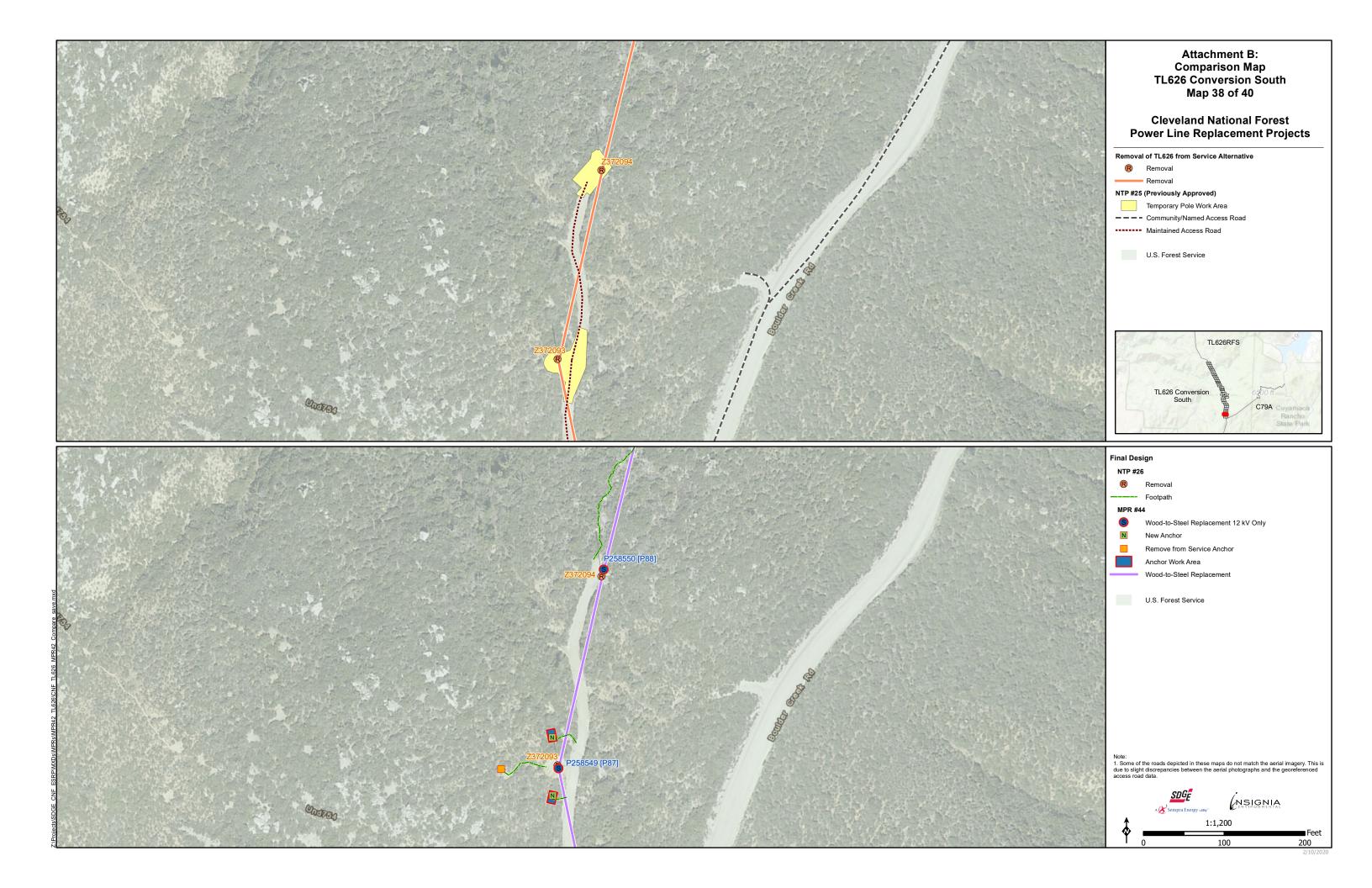


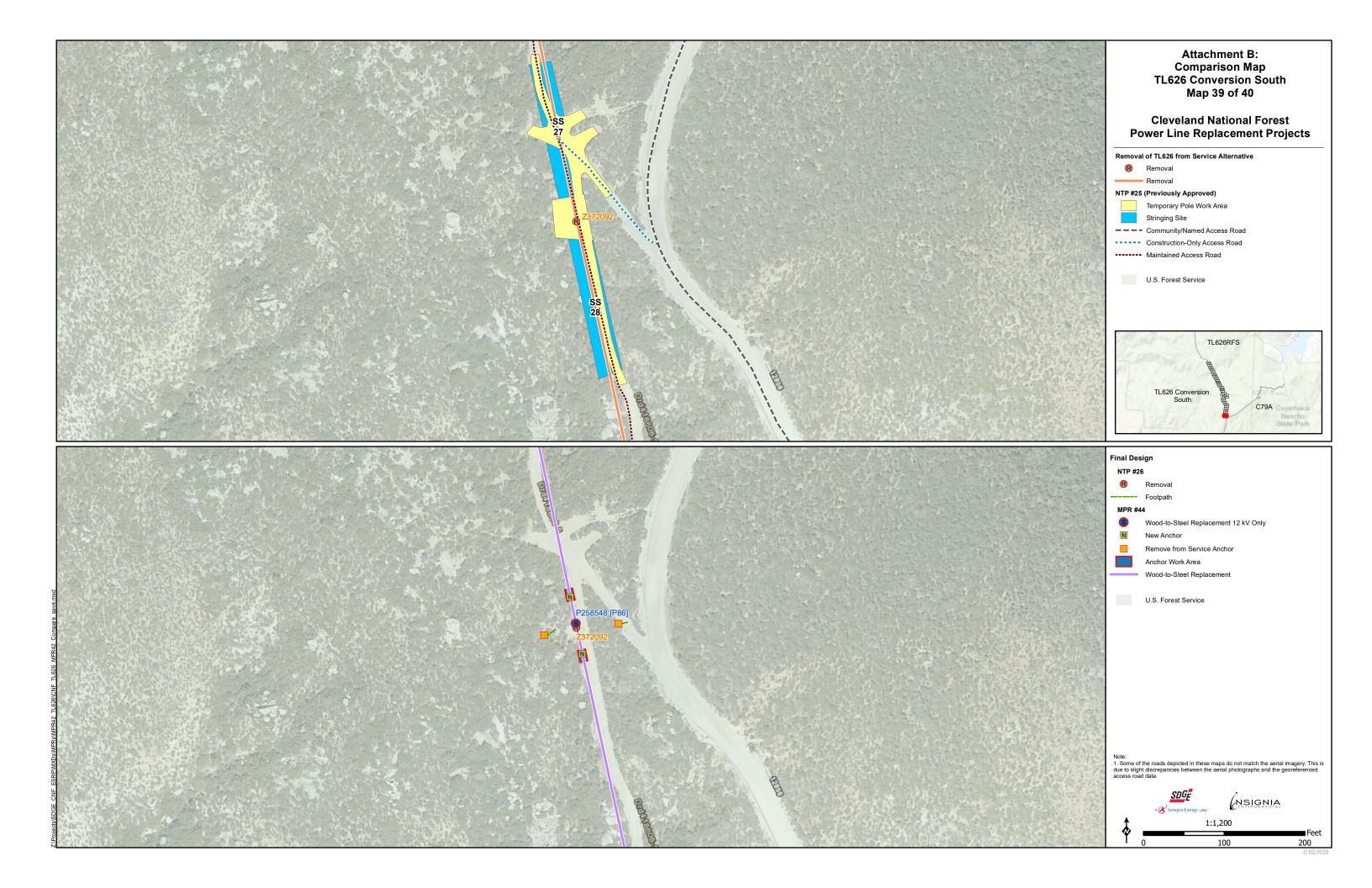














ATTACHMENT C: IMPACTS TABLE

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
---------------------	------

Impact Location	Approximate Impacts (acres)		
	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground
Permanent Impacts			
Anchors	< 0.01		<0.01
Poles	< 0.01		<0.01
Total	<0.01		<0.01
Temporary Impacts			
Access Roads ²	< 0.01		0.09
Anchor Work Areas	0.17		0.01
Pole Work Areas	0.34		0.32
Total ³	0.52		0.42
MPR #44 Total	0.52		0.42

¹ Some refinements overlap with previously approved Notice to Proceed (NTP) components. The overlapping area is not included in the impact totals.

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

³ The totals might not add up exactly due to rounding.