

# **CLEVELAND NATIONAL FOREST POWER LINE** REPLACEMENT PROJECTS



Screening Form)

## MINOR PROJECT REFINEMENT REQUEST **FORM**

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Date Submitted:	01-18-17		Request #:		003	
Date Approval Required:	02-07-17		Landowner:		Dean and Deborah Wilson	
APN:	XXX-XXX-XX an	nd XXX	-XXX-XX			
Refinement from (check all tha	t apply):					
☐ Mitigation Measure	□ АРМ	☐ APM		☐ Drawing		☑ Other
Identify source (mitigation mea	sure, project desci	ription,	etc.):			
The following sections of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cleveland National Forest Power Line Replacement Projects (Project) describe potential water sources that can be used during construction of the Project:  • page B-59 in Section B Project Description, • page D.9-38 in Section D.9 Hydrology and Water Quality, and • pages D.12-4 and D.12-5 in Section D.12 Public Services and Utilities.  Section D.9.3.3 discusses that SDG&E intends to use a variety of water sources (both public and private) including, but not limited to, the City of San Diego and local community services districts listed in Section D.12.1.2. At the time the Final EIR/EIS was published, SDG&E had not identified specific water sources or obtained formal commitments from water purveyors; however, the use of surface water was contemplated in relation to adverse effects on groundwater resources, as described in the following excerpt: "Water imports may include use of surface water or reclaimed water, neither of which would adversely affect groundwater resources (p. D.9-38 in Section D.9.3.3 of the Final EIR/EIS)."						
The Project's Water Supply Plan—which was approved by the United States Forest Service (USFS) on June 28, 2016 and the California Public Utilities Commission (CPUC) on August 11, 2016—also describes potential water sources for the Project and provides documentation of purchased water in accordance with Mitigation Measure (MM) HYD-2a. The information in this Minor Project Refinement (MPR) request describes an additional source of construction water—the Wilson Pond Facility—that was not specifically listed in the Final EIR/EIS. The Wilson Pond Facility was listed as a potential source of non-potable surface water in the Draft Water Supply Plan, submitted to the CPUC on June 13, 2016, under water supplier DD Axiom Resources LLC; however, in a letter dated July 28, 2016, the CPUC requested an MPR in order to include the Wilson Pond Facility (owned and operated by DD Axiom Resources LLC) as an approved water source. A description of and justification for the requested refinement are provided on page 2 of this MPR request.						
Attachments (check all that apply):						
✓ Refinement Screening Form  (see Attachment A: Minor  Project Refinement Request  Screening Form)	☐ Photos (see Attachment C: Photographs)  ☐ Maps (see Attachment B: Wilson Pond Facility Overview Map)			`	Attachment D: ve Letter)	

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? No. Section D.9.3.3 Direct and Indirect Effects of the Final EIR/EIS contemplates that SDGE will use multiple water sources and purveyors throughout the eastern portion of San Diego County. The Wilson Pond Facility is within the Community of Alpine, which is in eastern San Diego County, and is located within the vicinity of certain Project components. In addition, Section D.9.1.1 Regional Hydrologic Setting of the Final EIR/EIS identifies the Sweetwater Watershed in the analysis, which encompasses the area in which the Wilson Pond Facility is located.
- (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? No. See Attachment A: Minor Project Refinement Request Screening Form for the detailed assessment.
- (c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy? No.
- (d) Does the proposed refinement trigger an additional permit requirement? No. The use of surface water as a potential water source was contemplated in Section D Hydrology and Water Quality of the Final EIR/EIS. DD Axiom Resources LLC provides non-potable water for purchase from a surface water source known as the Wilson Ponds. DD Axiom Resources LLC maintains all necessary permits, authorizations, and agreements from jurisdictional authorities. SDG&E will not need to obtain any additional permits to purchase water from DD Axiom Resources LLC.

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

This MPR request proposes to add the Wilson Pond Facility as an additional source of construction water for the Project from February 2017 to December 2020. The source of water from the Wilson Pond Facility is surface water obtained from man-made, earthen stock ponds fed by rainfall and surface runoff. The Wilson Pond Facility is located on private property west of Japatul Valley Road and south of Bell Bluff Truck Trail within the community of Alpine, California. This location is within the vicinity of the Project, as depicted in Attachment B: Wilson Pond Facility Overview Map. DD Axiom Resources LLC also maintains the infrastructure that SDG&E would use to fill its water trucks/tankers. This infrastructure includes an approximately 12,000-gallon, elevated drop tank situated on a dirt access road off of Bell Bluff Truck Trail, which is a 30-foot-wide paved road located off of Japatul Valley Road and is depicted in Attachment C: Photographs. Water will be received by SDG&E and its contractors at this fill site (drop tank) and hauled to the Project site in water trucks/tankers. A will serve letter received from DD Axiom Resources LLC on December 28, 2016 states that approximately 30 million gallons of water can be provided to the Project from January 2017 to December 2020. The letter is provided in Attachment D: Will Serve Letter.

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

This MPR request has been prepared to diversify the Project's sources of construction water and to meet the water usage needs of the Project. Construction-related water will be primarily used for dust control, foundation construction, and earthwork activities. According to the Final EIR/EIS, it is anticipated that 5 million to 10 million gallons of water will be needed each year for the approximately five-year construction period. In accordance with MM HYD-2a, SDG&E has developed a Water Supply Plan for the Project identifying the sources and amounts of water to be obtained by SDG&E. Currently, the approved initial source of construction water, as described in the Water Supply Plan, is the City of San Diego Public Utilities Department (PUD), which has confirmed that up to 50 million gallons of water will be available for the Project from August 2016 to December 2020.

While the water sourced from the PUD is sufficient to provide the anticipated water needs of the Project, the Wilson Pond Facility will provide a closer construction water source, especially for the eastern sections of the Project, such as TL625, TL629, and other components in the area. A more local option will decrease the length of trips needed to transport the water to construction sites from the current PUD filling location. Further, an additional water source will help ensure that the Project maintains a reliable water supply to meet construction needs by reducing the Project's dependence on one source of water.

Date refinement is expected to be implemented: 02-07-
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#### **Landowner Approval (if required)**

Landowner Name		Signature or Other Consent (see attached)			Date
Dean and Deborah Wilson	See Attachment D: Will Serve Letter			12-28-16	
Resource Agency Coordination					
Resource Agency Name Action Required Date Documentation (see attached if yes)					
No resource agency coordination or authorizations will be required as a result of the requested refinement.					

ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

#### MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

#### RESOURCE EVALUATION

The proposed refinement was evaluated to verify that it 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 table provides a brief summary of the potential impact for each resource area analyzed in the Final EIR/EIS and whether the refinement will not change (no change), slightly increase, or slightly decrease the significance level of the impact as identified in the Final EIR/EIS.

<b>EIR/EIS Section</b>	Summary of Potential Impacts
Visual Resources	<i>Not Applicable</i> . No construction activities will occur at this location; therefore, there will be no impact on visual resources.
Agriculture and Forestry Resources	<i>Not Applicable.</i> No construction activities will occur at this location; therefore, there will be no impact on agriculture and forestry resources.
Air Quality	No Change. As described in Impact AIR-1 in the Final EIR/EIS, construction of the Project will "result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials." In addition, impacts associated with volatile organic compounds, nitrogen oxides, carbon monoxide, and fine particulate matter emissions are considered significant and unavoidable under the California Environmental Quality Act (CEQA) (Class I). It is anticipated that there will be approximately five trips made daily to the Wilson Pond Facility during construction. The number of trips to transport water will not increase beyond what was analyzed in the Final EIR/EIS because the refinement will not increase the amount of water needed for construction of the Project. Additionally, the Wilson Pond Facility is located closer to Project components as compared to the City of San Diego Public Utilities Department (PUD). Thus, obtaining water from the Wilson Pond Facility will not increase air emissions beyond what was analyzed in the Final EIR/EIS.  The closest sensitive receptor to the Wilson Pond Facility drop tank is approximately 0.70 mile southeast and occurs on the landowners' property. There are also sensitive receptors located along Bell Bluff Truck Trail, and some are within 200 feet of the road. Approximately five trips will be made daily to the Wilson Pond Facility. Therefore, travel to the drop tank will occur intermittently and for short periods of time throughout the day, which will not expose sensitive receptors to significant pollutant concentrations. Further, with the implementation of Applicant-Proposed Measures (APMs) AIR-01 and AIR-05, which require the minimization of vehicle idling time and the use of low-emission equipment, the use of the

EIR/EIS Section	Summary of Potential Impacts
	Wilson Pond Facility for construction water will not be adverse under the National Environmental Policy Act. Under CEQA, impacts will continue to be less than significant with mitigation.
	In conclusion, the requested refinement will not result in a new significant impact nor result in a substantial increase in the severity of a previously identified impact to air quality.
Biological Resources	<i>Not Applicable.</i> No construction activities will occur at this location. The Wilson Pond Facility is located on an existing road and water trucks will be traveling on existing roads. Thus, the requested refinement will not impact biological resources.
Cultural and Paleontological Resources	Not Applicable. No construction activities will occur at this location; therefore, no impacts to cultural or paleontological resources will occur.
Greenhouse Gas Emissions	No Change. The Final EIR/EIS found impacts associated with greenhouse gas emissions will be less than significant (Class III). The Final EIR/EIS calculated that the highest construction emissions in any one year for the Project will equal approximately 9,017 metric tons of carbon dioxide equivalent (MTCO <sub>2</sub> e) per year or 8,116 MTCO <sub>2</sub> e per year with the implementation of APM AIR-01, which is below the greenhouse gas threshold of 10,000 MTCO <sub>2</sub> e per year. The use of the Wilson Pond Facility will not increase the amount of heavy equipment utilized nor the number of trips needed to complete construction as contemplated in the Final EIR/EIS; thus, no change in impacts will occur. Therefore, the refinement will not result in a new significant impact nor a substantial increase in the severity of a previously identified impact to greenhouse gas emissions.
Public Health and Safety	No Change. The Final EIR/EIS found that impacts associated with public health and safety will be less than significant with mitigation (Class II). Implementation of the Project's Spill Response and Notification Plan will minimize and avoid impacts from the release of hazardous materials. Therefore, the refinement will not result in a new significant impact nor a substantial increase in the severity of a previously identified impact to public health and safety.
Fire and Fuels Management	<i>Not Applicable.</i> No construction activities will occur at this location. The Wilson Pond Facility is located on an existing road and water trucks will be traveling on existing roads. Thus, the requested refinement will not impact fire and fuels management.
Hydrology and Water Quality	No Change. The Final EIR/EIS found that impacts associated with hydrology and water quality will be less than significant with mitigation (Class II). Section D.9.3.3 states that "Water imports may include use of surface water or reclaimed water, neither of which would adversely affect groundwater resources (p. D.9-38 in Section D.9.3.3 of the Final EIR/EIS)." As demonstrated throughout the Impact HYD-3 analysis in the Final EIR/EIS, the Class II significance level for impacts to water resources is not dependent on the use of surface water, but rather on whether construction will impact

Summary of Potential Impacts
(i.e., deplete) groundwater supplies. Obtaining water from the Wilson Pond Facility, which is a surface water source, will not result in impacts to groundwater resources.
In conclusion, the requested refinement will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact to hydrology and water quality.
<i>Not Applicable.</i> No construction activities will occur at this location; therefore, no impacts associated with land use and planning will result.
No Change. The Final EIR/EIS found that impacts associated with noise will be less than significant with mitigation (Class II). Additional noise will be generated near the Wilson Pond Facility due to water trucks receiving water from the drop tanks. However, noise impacts associated with this equipment will be the same as the equipment analyzed in the Final EIR/EIS, and there will be no change from the types of equipment listed in the Final EIR/EIS. Additionally, the overall construction schedule will not be affected by the refinement.
The closest sensitive receptor to the Wilson Pond Facility is approximately 0.70 mile southeast. There are also sensitive receptors located along Bell Bluff Truck Trail (including some within 200 feet), which is the access road to the drop tank. Approximately five trips will be made daily to the Wilson Pond Facility. Therefore, travel to the drop tank will occur intermittently and for short periods of time throughout the day. Further, implementation of APM NOI-03 will ensure that equipment is properly equipped with exhaust mufflers and maintained in accordance with the manufacturer's recommendations. Thus, the requested refinement will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact to noise.
No Change. The Final EIR/EIS found that impacts associated with public services and utilities will be less than significant with mitigation (Class II). The analysis for Impact PSU-1 in the Final EIR/EIS discussed obtaining a reliable water supply for the Project so as not to adversely impact municipal water services. As demonstrated in the analysis, the Class II significance level for impacts to public services and utilities is not dependent on the amount of water used, but rather on whether a reliable water supply can be obtained without requiring new or expanded municipal water facilities or services. As the Wilson Pond Facility is privately developed, no new or expanded municipal water facilities or services will be necessary and use of the Wilson Pond Facility as a source of construction water may reduce the Project's use of the PUD (i.e., a municipal water source) as a construction water source. Therefore, obtaining water from the Wilson Pond Facility will not result in an additional impact to municipal water services.  No public services (e.g., fire protection or telecommunications) will be disrupted as a result of the proposed refinement.

EIR/EIS Section	Summary of Potential Impacts
	In conclusion, the requested refinement will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact to public services and utilities.
Recreation	No Change. The Final EIR/EIS found that impacts associated with recreation will be less than significant with mitigation (Class II). As provided in the Final EIR/EIS, the nearest recreation area to the Wilson Pond Facility is the Pine Creek Wilderness, which is located more than one mile to the southeast. The wilderness is accessible via the Horsethief Trailhead, which is located farther south off of Lyons Valley Road. Due to the distance of the Wilson Pond Facility from the wilderness, use of the refinement will not affect recreational activities at this location. Therefore, the requested refinement is consistent with the Final EIR/EIS analysis and will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact to recreation.
Transportation and Traffic	No Change. The Final EIR/EIS found that impacts associated with transportation and traffic will be less than significant (Class III). Travel to the Wilson Pond Facility will affect the same roadways that were analyzed in the Final EIR/EIS, including Japatul Valley Road, which connects to Bell Bluff Truck Trail and the Wilson Pond Facility. Water trucks/tankers and support pickup trucks, which were previously contemplated in the Final EIR/EIS, will be used to access the Wilson Pond Facility. In addition, the total number of truck trips associated with use of the Wilson Pond Facility will not increase beyond what was analyzed in the Final EIR/EIS. Further, the length of the trips needed to transport water to the Project will be shorter from the Wilson Pond Facility than the trips needed to transport water sourced from the PUD. Thus, the refinement will not result in additional traffic nor significantly impact the level of service for Japatul Valley Road.  In conclusion, the requested refinement will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact to transportation and traffic.

## ATTACHMENT B: WILSON POND FACILITY OVERVIEW MAP



# ATTACHMENT C: PHOTOGRAPHS



# Cleveland National Forest Power Line Replacement Projects Minor Project Refinement Request # 003 Attachment C: Photographs



### Photograph 1:

View of the drop tank and the dirt road from paved Bell Bluff Truck Trail, as observed on December 29, 2016.



## Photograph 2:

A close-up view of the drop tank and the four-inch water line that feeds water from the ponds to the drop tank, as observed on December 29, 2016.

## ATTACHMENT D: WILL SERVE LETTER

December 28, 2016

Ms. Kirstie Reynolds Environmental Manager, Major Projects San Diego Gas & Electric 1010 Tavern Road, SD 1116 Alpine, California 91901

Re: Will Serve Letter for Construction Water

Dear Ms. Reynolds,

I am in receipt of a request for a Will Serve letter to provide construction water for your upcoming Power Line Replacement projects. Water can be obtained from our 12,000 gallon elevated drop tank situated next to a 30 foot wide paved road at 23320 Bell Bluff Truck Trail located off of Japatul Valley Road in East County. It is the same drop tank we have used to deliver over 19,000,000 gallons of water to the SDG&E Suncrest Substation during the last 4 years.

We can provide 30,000,000 gallons of water for your upcoming project. We are able to provide the water beginning immediately through December 2020. The source of the water is surface diversion from large ponds on our 900 acre ranch property. The water is non-potable.

I am available to answer any questions, so please call (619) 933-7933 to contact me directly.

Sincerely,

Ollwah S. Wilson

Owner

DD Axiom Resources, LLC