

Sempra Energy utility

CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

MINOR PROJECT REFINEMENT REQUEST FORM 05-31-19 035 **Date Submitted: Request #:** 06-14-19 XXX, XXX, XXX, XXX **Date Approval Required:** Landowner: XXX-XXX-XX, XXX-XXX-XX APN: **Refinement from (check all that apply):** □ Mitigation Measure \Box APM Project Description \Box Drawing ⊠ Other Identify source (mitigation measure, project description, etc.): Notice to Proceed (NTP) request #20/Minor Project Refinement (MPR) request #26 for Transmission Line (TL) 629A of the Cleveland National Forest Power Line Replacement Projects (Project) was approved by the California Public Utilities Commission (CPUC) and United States Forest Service on April 19, 2019. Since this approval, a landowner has requested that San Diego Gas & Electric Company (SDG&E) shift two poles. In addition, SDG&E has determined that a new regulator station is needed along TL629A. A brief description and justification of the refinements are provided on page 2 of this MPR request. Attachments (check all that apply): ⊠ Refinement Request Screening Form Maps (See \boxtimes Other (See (see Attachment A: Minor \Box Photos Attachment B: Attachment C: Impacts 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 Environmental Impact Report/Environmental Impact Study (EIR/EIS) study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. The refinements occur □ Yes 🖾 No partially within the baseline biological, cultural, and hydrological survey areas. Supplemental hydrological, biological, and cultural resources surveys were conducted in 2016, 2017, 2018, and 2019. 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? \Box Yes 🖾 No 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. (c) Does the proposed refinement conflict with any mitigation measure or applicable law \Box Yes 🖾 No or policy? (d) Does the proposed refinement trigger an additional permit requirement? \Box Yes 🖾 No

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

SDG&E requests the following refinements along TL629A:

- shifting of the replacement pole location for Pole P874492 and the associated new anchor by approximately 36 feet southwest, as well as the addition of new temporary pole work area and anchor work area;
- addition of 36 feet of new undergrounding from the removal pole location for Pole P874492 to the new replacement location and new underground temporary work limits;
- shifting of the replacement pole location for Pole Z172739 by approximately 14 feet west, as well as the addition of approximately 183 feet of construction-only access road¹ and new temporary pole work area; and
- addition of two new steel distribution poles for a pole-mounted 12 kilovolt regulator station and new temporary pole work area, as well as the establishment of approximately 82 feet of permanent maintained access road.

Attachment B: Comparison Map depicts the data approved in NTP #20/MPR #26 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 a total of approximately 0.14 acre of temporary impacts (of which approximately 0.04 acre is classified as native vegetation) and approximately 0.02 acre of permanent impacts.² 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):

The refinements are requested for the following reasons:

- The landowner requested that the replacement pole location for Pole P874492 be shifted away from the existing pole location to be further from the house and driveway. As a result, the new anchor associated with the pole also needs to be shifted and new temporary pole work area and anchor work area need to be added. Because the pole is a distribution riser pole, the pole shift requires new underground distribution line to be trenched from the new pole location to the existing underground conduit at the existing pole location and underground temporary work limits to be added.
- The landowner requested that the replacement pole location for Pole Z172739 be shifted away from the existing pole location to avoid removal of manzanita bushes (*Arctostaphylos* spp.). Use of the construction-only access road and the additional temporary pole work area will also reduce impacts to manzanita bushes and other vegetation within the temporary pole work area approved for Pole Z172739 in NTP #20.
- The new regulator station was inadvertently left out of the final design, but is required for voltage management on Circuit (C) 440, which is underbuilt on TL629A, and C442. As a result, additional temporary pole work area is needed to facilitate construction, and a permanent maintained access road is needed to allow for operations and maintenance access to the regulator station.

Date refinement is expected to be implemented: 06-17-19					
Resource Agency Coordination					
Resource AgencyNameAction RequiredDateDocumentation (see attached if yes)					
Not Applicable (N/A)	N/A	N/A	N/A	□ Yes	🖾 No

¹ This is an existing route that has been previously established by the landowner.

² Any area that overlaps with approved NTP #20/MPR #26 components is not included in the temporary and permanent impact 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 (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 evaluation³: Significant and unavoidable (Class I)/Adverse and unavoidable</i>			

Summary of Proposed Minor Project Refinement Impacts on Visual Resources:

The requested refinements are mostly minor, temporary workspace additions or adjustments to existing facilities and/or approved Project components that occur within or near the transmission line right-of-way (ROW). The new steel distribution poles supporting the regulator station and the two shifted wood-to-steel replacement poles will not substantially increase impacts to visual resources as they will be adjacent to or within the existing transmission line ROW. In addition, the approximately 36 feet of underground distribution line work will occur within a previously developed area and will not result in additional impacts to visual resources due to its negligible length and the short duration of construction in this location. Furthermore, the establishment of approximately 82 feet of permanent maintained access road will not substantially increase impacts to visual resources due to its negligible length and proximity to other existing maintained access roads and facilities.

Impacts to the visual character of the area may occur as a result of minor grading, vegetation clearing, and undergrounding. However, temporary impacts will be reduced with the implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. The requested refinements will be consistent with the visual resource analysis defined in the Final EIR/EIS, and will not impact scenic vistas or substantially affect existing views from an eligible State Scenic Highway (i.e., Interstate [I-] 8), a National Forest Scenic Byway (i.e., Sunrise Scenic Byway), and a County of San Diego Scenic Route (i.e., Old Highway 80). 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 visual resources as identified in the Final EIR/EIS.

³ 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)? <i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i>			
I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Air Quality:

Activities associated with utilization of the requested refinement areas (e.g., the type of equipment used) will be consistent with those discussed in the Final EIR/EIS and will not increase air emissions beyond what was analyzed. Similar to Notice to Proceed (NTP) #20 and Minor Project Refinement (MPR) #26, 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. The approximately 36 feet of underground distribution line work and establishment of approximately 82 feet of permanent maintained access road will result in a negligible increase in air quality impacts due to the short lengths of each refinement. The additional minor grading and vegetation clearing required for the refinement areas may result in a minor increase in air quality impacts, 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. In addition, the maintained access road will be included in the SDG&E Transmission, Construction, and Maintenance Group's road maintenance program to help reduce air quality impacts during the operations and maintenance portion of the Project. 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.

Biological Resources (e.g., result in temporary or permanent loss of native vegetation, preserve areas, native wildlife and/or their habitats; cause an adverse effect to jurisdictional waters or sensitive or special-status species; result in the introduction of invasive, non-native, or noxious plant species; conflict with local, regional, or state habitat conservation plan; or interfere with the movement of any resident or migratory wildlife)?		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

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, supplemental surveys of the requested refinement areas were conducted in 2019. Other supplemental surveys conducted in 2017, 2018, and 2019 along Transmission Line (TL) 629A included a bat roost assessment and follow-up surveys for Townsend's big-eared bat (*Corynorhinus townsendii*) and other special-status 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 0.14 acre of temporary impacts and approximately 0.02 acre of permanent impacts. This includes approximately 0.12 acre of total impacts (i.e.,

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
temporary and permanent impacts) to developed/disturbed areas ⁴ southern mixed chaparral ⁵ .	⁴ and approximate	ly 0.04 acre of to	otal impacts to
No special-status plants, special-status butterfly host plants, spec Fish and Wildlife Service-designated critical habitat, or U.S. For- requested refinements. All APMs and mitigation measures (MM	est Service occup	ied habitat occur	within the
Monitoring, Compliance, and Reporting Program—as well as oth implemented as applicable to minimize or mitigate for any additi refinements will not result in a new significant impact or a substa analyzed impact to biological resources as identified in the Final	her permit and pla ional impacts. Th antial increase in t	n conditions—w erefore, the requ	vill be ested

(Class II)/Adverse

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

The requested refinement areas occur within the Project's area of potential effect, as defined in the Project's Programmatic Agreement. The refinement areas were partially surveyed for cultural resources during initial surveys for the Project in 2008, 2009, and 2010. In addition, intensive supplemental pedestrian surveys of the refinement areas were conducted by ASM Affiliates, Inc. in 2016, 2018, and 2019. No new cultural resources were recorded, and no previously recorded cultural resources were identified during the supplemental surveys. 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 cultural resources as identified in the Final EIR/EIS.

The requested refinement areas are underlain by geologic rock units/formations assigned a rank of Potential Fossil Yield Classification (PFYC) Class 1 (i.e., very low sensitivity) and Class 3 (i.e., moderate or unknown sensitivity). Pole P874492 (a direct-bury pole) and the associated undergrounding are underlain by sedimentary rock units with a PFYC Class 3 ranking. In accordance with APM CUL-08, a paleontological monitor will be present for excavation activities that are located in areas that are underlain by PFYC Class 3 deposits. In addition, the Paleontological Monitoring & Treatment Plan will be updated to include these locations as requiring 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.

⁴ These impacts fall in the Agricultural/Disturbed/Developed/Bare Ground impact category for SDG&E's Subregional Natural Community Conservation Plan (NCCP).

⁵ These impacts fall in the Native Vegetation impact category for SDG&E's Subregional NCCP.

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
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>			

Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:

Activities associated with the utilization of the requested refinement areas are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional minor grading, vegetation clearing, and undergrounding 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.

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 (Class II)/Adverse</i>		

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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>			
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Summary of Proposed Minor Project Refinement Impacts on Fire and Fuels Management:

The requested refinements are located within the Very High Fire Hazard Severity Zone, which was 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.

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)? <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 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. Supplemental water resource surveys of the refinement areas were conducted in 2018 and 2019. The requested refinements do not contain any waters of the state or the U.S.; therefore, no jurisdictional water permitting will be required. To minimize potential impacts from erosion and off-site sedimentation during construction, the refinement areas will be included in a Change of Information for the Circuit 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 addition, the maintained access road will be included in the SDG&E Transmission, Construction, and Maintenance Group's road maintenance program to help reduce hydrology and water quality impacts during the operations and maintenance portion of the Project. 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		

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 TL629A were notified of construction activities associated with NTP #20 on March 18, 2019. The property owners within 1,000 feet of the requested refinements were 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 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 and same CNF Land Management Plan land use zone 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:

Construction-related noise will be generated within the requested refinement areas due to anchor and pole work, vegetation clearing, minor grading, undergrounding, and large equipment operation. Similar to NTP #20 and MPR #26, 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. 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. 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 constr new, or expansion of existing, facilities for fire pro- municipal water supplies, telecommunications, and waste; or disrupt electric service)?	tection,	
Final EIR/EIS evaluation: Less than significant wi (Class II)/Adverse	th mitigation	

Summary of Proposed Minor Project Refinement Impacts on Public Services and Utilities:

The requested refinements will be consistent with the public services and utilities analysis in the Final EIR/EIS and will not require new or expanded public facilities or services. 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 are located within or adjacent to the approved TL629A alignment and near the California Riding and Hiking Trail. Consistent with the analysis in the Final EIR/EIS, use of the refinement areas will not reduce or preclude access or visitation to this trail, nor will it increase the possibility of unauthorized access to specially designated or restricted 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 recreation as identified in the Final EIR/EIS.

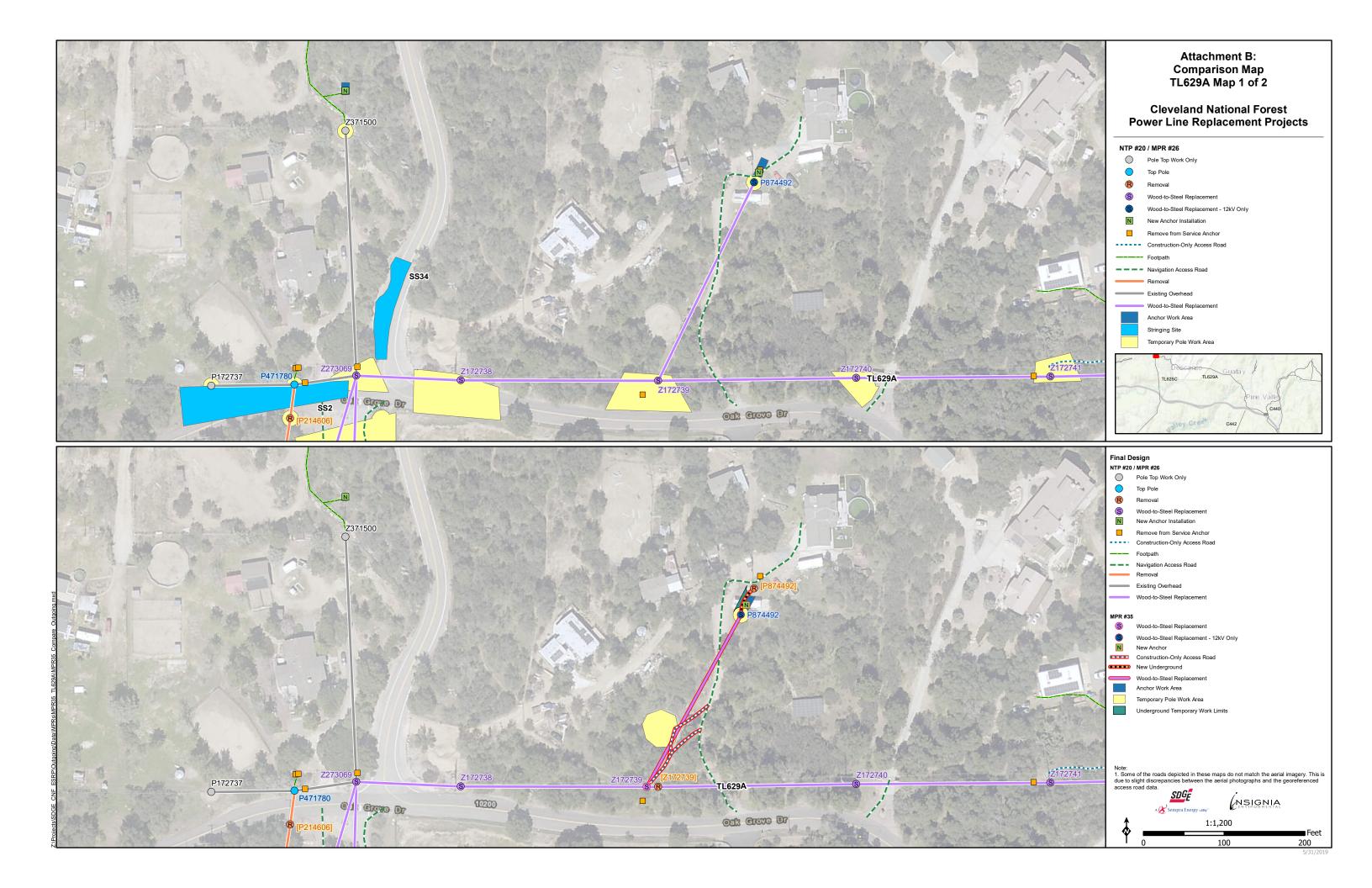
Final EIR/EIS Consistency Checklist					
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A		
Transportation and Traffic (e.g., conflict with an applicable congestion management program or a plan, 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					

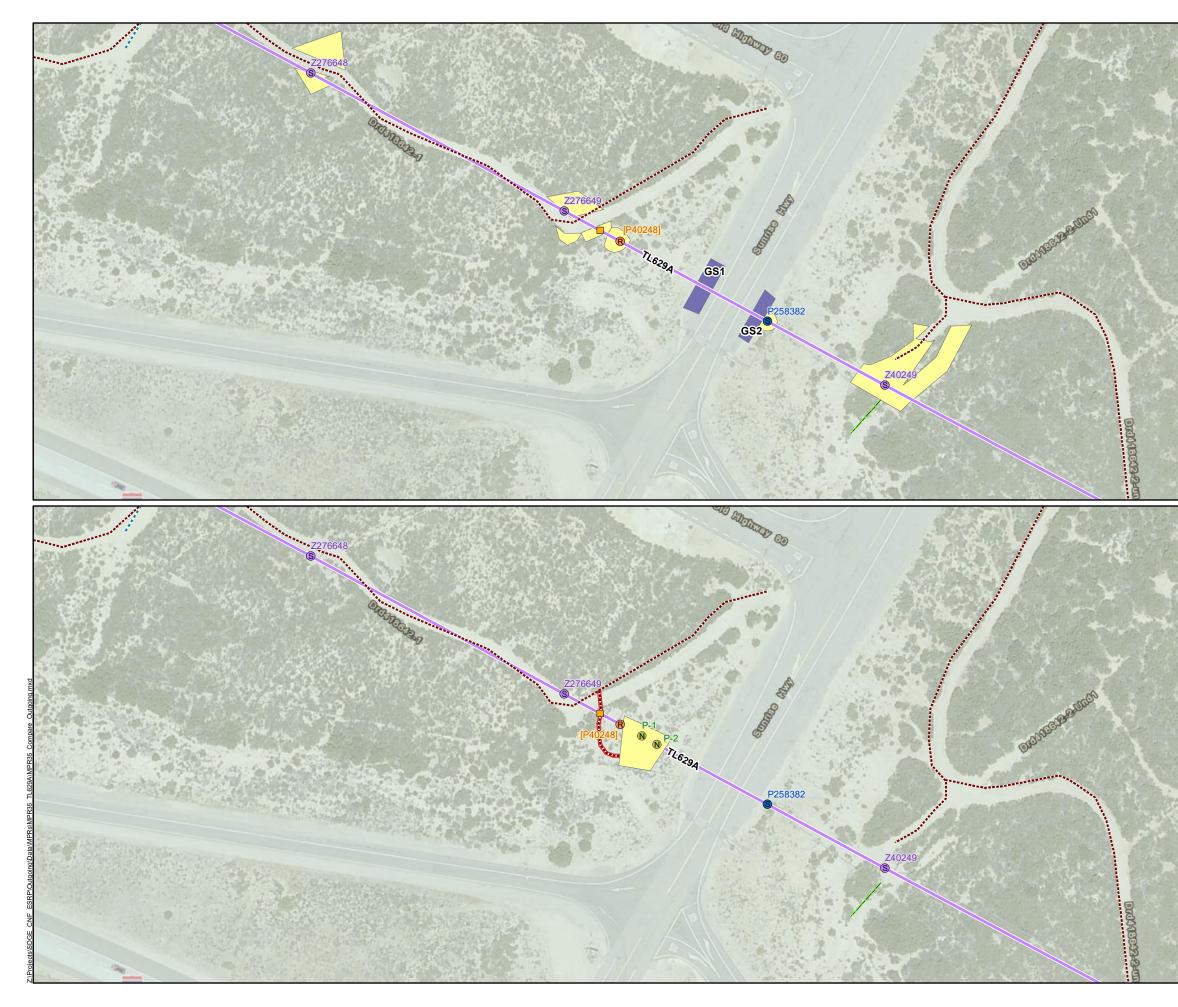
Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:

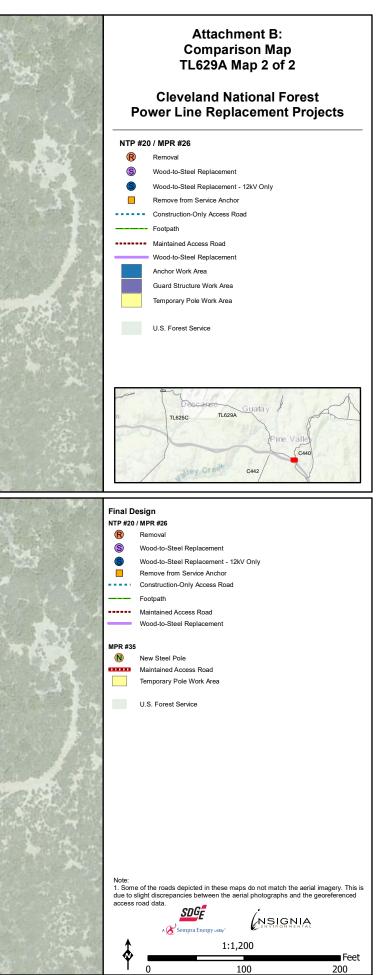
The requested refinements will not require additional or different types of construction vehicles and equipment than those discussed in the Final EIR/EIS. In addition, the total number of truck trips associated with construction of the Project will not change, and the use of the requested refinement areas will affect the same roadways as those identified in NTP #20/MPR #26 and analyzed in the Final EIR/EIS (i.e., Oak Grove Drive, Sunrise Highway, Old Highway 80, and I-8), as well as some smaller private roads. With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to the existing levels of service (LOS)⁶ 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.

⁶ Old Highway 80 has an LOS of A through D; Sunrise Highway and I-8 have an LOS of A through C; and an LOS does not exist for Oak Grove Drive or the smaller private roads.

ATTACHMENT B: COMPARISON MAP







5/31/2019

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	Table
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Import I costion	Approximate Impacts (acres)						
Impact Location	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground				
Permanent Impacts							
Maintained Access Road			0.02				
Poles			<0.01				
Total			0.02				
Temporary Impacts							
Access Roads ²	0.04						
Anchor Work Areas			<0.01				
Pole Work Areas			0.09				
Underground Work Limits			<0.01				
Total ³	0.04		0.10				
MPR #35 Total	0.04		0.12				

¹ Any area that overlaps with approved Notice to Proceed #20/Minor Project Refinement #26 components is not included in the temporary and permanent impact 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.

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