

# CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

A Sempra Energy uti	ity MINOR PI	ROJE	CT REFINEM	IEN	r requ	UEST I	FORM
Date Submitted:	9-05 <b>-</b> 19		Request #:		039		
Date Approval Required:	9-19-19		Landowner:		Various		
APN:	XXX-XXX-XX, XX	X-XXX-	-XX, XXX-XXX-XX	Κ			
Refinement from (check all	that apply):						
☐ Mitigation Measure	$\Box$ APM	🛛 Pr	oject Description		Drawing	$\boxtimes$	Other
Identify source (mitigation	measure, project des	cription,	, etc.):				
Notice to Proceed (NTP) request #22/Minor Project Refinement (MPR) request #31 for Transmission Line (TL) 625C of the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest Power Line Replacement Projects (Project) was approved by the California Public Utilities Commission (CPUC) and United States Forest Service on June 18, 2019. Since this approval, additional refinements have been identified along TL625C, including a temporary shoofly that will help minimize outages, a removal pole that was inadvertently omitted from the data, and a reconfigured construction-only access road that will minimize vegetation removal. A brief description and justification of the refinements are provided on page 2 of this MPR request.						ng tly	
Attachments (check all that	t apply):						
					Other (Se nent C: In Table)		
Under Order 2 of the Decision Granting SDG&E Permit to Construct the Cleveland National Forest Power Line Replacement Projects (D.16-05-038), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 2 of the Decision, respond "yes" or "no" to the following questions (a) through (d).							ertain
(a) Is the proposed refinem area? The requested refinements ar Environmental Impact Repor depicted in Figure ES-1 Regi within the baseline biologica hydrological survey areas. S surveys were conducted in 20 surveys conducted are provid Project Refinement Request	e located within the ge t/Environmental Impac onal Overview Map in l survey area, and parti upplemental hydrologi 017, 2018, and 2019. A led in each applicable	cographic ct Study in the Fina ially with ical, biol- Addition	c boundary of the Fir (EIR/EIS) study area al EIR/EIS. The refin nin the baseline cultu ogical, and cultural r al details regarding th	nal a, whic nement ral and esource he spec	h is ts occur es bific	□ Yes	⊠ No
<ul> <li>(b) Will the proposed refine increase in the severity of a used in the EIR/EIS?</li> <li>A discussion of changes in si criteria used in the Final EIR area are fully analyzed in Att</li> </ul>	previously identified gnificant impacts due /EIS and is resource ar	to the rec	ant impact based or quested refinements fic. The changes to o	n the ca is base each re	<b>riteria</b> d on source	□ Yes	🖾 No
(c) Does the proposed refin or policy?	ement conflict with a	ny mitig	ation measure or ap	oplicat	ole law	□ Yes	🛛 No

(d) Does the proposed refiner	nent trigger an addit	ional	l permit requirer	nent?		$\Box$ Yes	🖾 No
Describe refinement being re	quested (attach draw	vings	and photos as no	eeded):			
SDG&E requests the following	refinements along TL	.6250	C:				
<ul> <li>removal of Pole P275873, as well as the addition of a temporary pole work area and footpath;</li> <li>addition of two temporary new tap poles, temporary pole work areas, and approximately 325 feet of construction-only access road for a shoofly for Pole Z272976; and</li> <li>reconfiguration of the previously approved construction-only access road for Poles Z272941, P259131, and Z272942.<sup>1</sup></li> </ul>							
Minor road repairs (e.g., minor grading) may be required to restore the construction-only access roads to pre- construction conditions. 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.							
Attachment B: Comparison Map depicts the data approved in NTP #22/MPR #31 and Workspace Adjustment #67 in comparison to the requested refinements, as described in this MPR request. The requested refinements will result in a total of approximately 0.16 acre of temporary impacts (of which approximately 0.02 acre is classified as native vegetation) and no permanent impacts. <sup>2</sup> The breakdown of the temporary impacts is summarized in Attachment C: Impacts Table.							
Provide need for refinement	(attach drawings and	l pho	tos as needed):				
The refinements are requested	for the following reaso	ons:					
<ul> <li>The removal of Pole P275873, as well as the associated temporary pole work area and footpath, were inadvertently omitted from the NTP request #22/MPR request #31 data, but are required to replace the existing pole.</li> <li>The shoofly for Pole Z272976 will provide power to nearby customers during sectionalized outages in the area, as well as aid in wire stringing activities for Poles Z272976 and Z272977. To create the shoofly, two temporary new tap poles, temporary pole work areas, and a construction-only access road are required.</li> <li>Reconfiguration of the previously approved construction-only access road for Poles Z272941, P259131, and Z272942 will make use of already disturbed areas, provide turnaround space, minimize vegetation removal, avoid tree trimming, and reduce impacts to the landowner's property.</li> </ul>							e the es in the ofly, two iired. 59131,
Date refinement is expected t	o be implemented:	9-2	0-19				
Resource Agency Coordination	on						
Resource Agency	Name		Action Required	Date		Documen e attache	
Not Applicable (N/A)	N/A		N/A	N/A		es 🛛	⊠ No

<sup>&</sup>lt;sup>1</sup> The reconfigured construction-only access road is approximately 373 feet and the previously approved construction-only access road is approximately 291 feet; therefore, there will be an increase of approximately 82 feet of construction-only access road.
<sup>2</sup> Any area that overlaps with approved NTP #22/MPR #31 components is not included in the temporary impact total. In

<sup>&</sup>lt;sup>2</sup> Any area that overlaps with approved NTP #22/MPR #31 components is not included in the temporary impact total. In addition, the acreage for the previously approved construction-only access road, which is approximately 0.07 acre of bare ground and urban and developed/ornamental landscaping and approximately 0.01 acre of southern mixed chaparral, has been subtracted from this total.

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 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
<b>Visual Resources</b> (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 evaluation<sup>3</sup>: Significant and unavoidable (Class I)/Adverse and unavoidable</i>			

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

The addition of two temporary new tap poles will not substantially increase impacts to visual resources as they are located adjacent to the existing transmission line right-of-way and will be removed once wire stringing on this section of Transmission Line (TL) 625C has been completed. The addition of construction-only access roads and temporary pole work areas may impact the visual character of the surrounding areas due to road repairs and/or vegetation removal. However, temporary impacts will be reduced with the implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. In addition, the requested refinements will be consistent with the visual resource analysis defined in the Final EIR/EIS and will not impact scenic vistas or affect existing views from eligible State Scenic Highways or County of San Diego Scenic Routes. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to visual resources as identified in the Final EIR/EIS.

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 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. 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 additional road repairs and vegetation removal required for the refinement areas may result in a minor increase in air quality impacts in localized areas. However, 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

<sup>&</sup>lt;sup>3</sup> The Final EIR/EIS evaluations of impact significance are provided for each resource; this table notes the most significant determination within each resource section identified in the Final EIR/EIS.

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

The requested refinement areas were 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 2018 and 2019. Supplemental surveys conducted in 2018 along TL625C 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 rare plants.

The requested refinements will result in a total of approximately 0.16 acre of temporary impacts. This includes approximately 0.06 acre of temporary impacts to developed/disturbed areas<sup>4</sup> and approximately 0.10 acre of temporary impacts to the following vegetation communities<sup>5</sup>:

- approximately 0.01 acre of mixed oak woodland;
- approximately 0.08 acre of non-native grassland; and
- approximately 0.01 acre of southern mixed chaparral.

No special-status butterfly host plants, United States (U.S.) Fish and Wildlife Service-designated critical habitat, or U.S. Forest Service occupied habitat occur within the requested refinements. However, Engelmann oaks (*Quercus engelmannii*), which have a 4.2 California Rare Plant Rank, are located adjacent to or near the requested refinements. Per the Project's approved Special-Status Plant Species Salvage and Relocation Plan, complete avoidance is required for Engelmann oaks. In addition, approximately 0.03 acre of temporary impacts to occupied Hermes copper butterfly habitat will occur due to the reconfigured construction-only access road for Poles Z272941, P259131, and Z272942.<sup>6</sup> Impacts to this species were analyzed in the Final EIR/EIS; all APMs and mitigation measures (MMs) defined in the Project's Mitigation Monitoring, Compliance, and Reporting Program—as well as other permit and plan conditions—will be implemented as applicable to minimize or mitigate for any additional impacts. 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 biological resources as identified in the Final EIR/EIS.

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

<sup>&</sup>lt;sup>5</sup> Mixed oak woodland and southern mixed chaparral fall in the Native Vegetation impact category and non-native grassland falls in the Non-Native Grassland impact category for SDG&E's Subregional NCCP.

<sup>&</sup>lt;sup>6</sup> Any area that overlaps with approved Notice to Proceed (NTP) #22/Minor Project Refinement (MPR) #31 components is not included in the temporary impact totals for habitat. In addition, the acreage for the previously approved construction-only access road has been subtracted from this total.

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

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

The 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 2009 and 2010. In addition, intensive supplemental pedestrian surveys of the refinement areas were conducted by ASM Affiliates, Inc. in 2017, 2018, and 2019. One cultural resource was recorded during the baseline surveys in 2009 and updated in 2017 in support of NTP request #22/MPR request #31. No new or additional cultural resources were identified during the supplemental surveys. Environmentally sensitive area (ESA) fencing was installed around the resource for construction activities related to NTP #22/MPR #31, in accordance with the Project's Historic Properties Management Plan. It is recommended that ESA fencing be maintained for the duration of construction activities in this location. With implementation of this recommendation, 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). Because the refinement does not require excavation underlain by rock units with a PFYC Class 3 (moderate or unknown sensitivity) ranking, additional paleontological monitoring and an update to the Paleontological Monitoring & Treatment Plan will not be required. 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.

<b>Greenhouse Gases</b> (e.g., result in a net increase of greenhouse gas emissions, or conflict with an applicable plan, policy, or regulation that reduces greenhouse gas emissions)?	$\boxtimes$	
Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse		

# 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 road repairs 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
<b>Public Health and Safety</b> (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.

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

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

The requested refinements 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.

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>			
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# 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. 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. 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.

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
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)? <i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i>			
I)/Adverse and unavoidable			
Summary of Proposed Minor Project Refinement Impacts on	Land Use:		
1,000 feet of the requested refinements were included in that notifi not introduce a new land use, establish a permanent barrier or ob- or separation of use. In addition, the requested refinements will r policies, or regulations of an agency with jurisdiction over the Pr San Diego land use and zoning designations that were analyzed is refinements will not result in new significant impacts or a substan- analyzed impact to land use as identified in the Final EIR/EIS.	stacle between us not conflict with t oject, as they are n the Final EIR/E	es, or create a ph he applicable lar located in the sa IS. Therefore, th	ysical division ad use plans, me County of the requested
<b>Noise</b> (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 removal, road repairs, and large equipment operation. The refine sensitive receptors. Potential noise impacts to sensitive receptors analyzed in the Final EIR/EIS. Use of the refinement areas may however, the construction activities will be short-term and tempo noise-related MMs and APMs, noise impacts from construction a will be the same as those analyzed in the Final EIR/EIS. Therefor new significant impact or a substantial increase in the severity of	ement areas are lo s within 1,000 fee result in temporar orary. In addition activities associate ore, the requested	cated within 1,00 t of Project comp ry increases in no , with the implem ed with the refine refinements will	00 feet of ponents were bise levels; nentation of ement areas not result in
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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation</i>			

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.

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
<b>Recreation</b> (e.g., reduce access and visitation to recreation areas, preclude recreational activities, or result in increased, unauthorized access to specially designated or restricted areas)?	$\boxtimes$		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

# Summary of Proposed Minor Project Refinement Impacts on Recreation:

The requested refinement areas are located adjacent to the approved TL625C alignment and approximately one mile from the Pine Creek Wilderness. Consistent with the analysis in the Final EIR/EIS, use of the refinement areas will not reduce or preclude access or visitation to this recreation area, 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.

<b>Transportation and Traffic</b> (e.g., conflict with an applicable congestion management program or a plan, ordinance, or policy associated with the circulation system or alternative transportation; increase hazards due to a design feature; or result in inadequate emergency access)?		
Final EIR/EIS evaluation: Less than significant 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 analyzed in the Final EIR/EIS (i.e., Japatul Valley Road and Larry Lane), 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)<sup>7</sup> 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.

<sup>&</sup>lt;sup>7</sup> Japatul Valley Road has an LOS of A through C. An LOS does not exist for Larry Lane and the smaller private roads.

**ATTACHMENT B: COMPARISON MAP** 





ATTACHMENT C: IMPACTS TABLE

# **ATTACHMENT C: IMPACTS TABLE**

Table 1: Impacts Table lists the temporary impacts<sup>1</sup> of this Minor Project Refinement (MPR) request by vegetation type and workspace type.

Table 1: Impacts	Table
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Impact Location	Approximate Temporary Impacts (acres)			
	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground	
Access Roads <sup>2</sup>	0.01	0.07	0.05	
Pole Work Area	0.01	0.01	0.01	
MPR #39 Total	0.02	0.08	0.06	

<sup>&</sup>lt;sup>1</sup> Any area that overlaps with approved Notice to Proeceed #22/MPR #31 components is not included in the impact total. In addition, the acreage for the previously approved construction-only access road has been subtracted from this total.

<sup>&</sup>lt;sup>2</sup> 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.