

CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS



A Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM

Date Submitted:	03-06-20		Request #: 46		46	16		
Date Approval Required:	03-20 - 20		Landowner: Tulloch l		Tulloch Family Partners LP			
APN:	41	412-060-01, 412-020-02, and 412-010-02						
Refinement from (check all that apply):								
☐ Mitigation Measure		☐ APM ☐ Project Description ☐ Drawing ☐ Other					Other	
Identify source (mitigation	mea	sure, project desc	ription,	etc.):			•	
Power Line Replacement Pro 2019 and by the California P Gas & Electric Company (SI movement of conductors) and	Notice to Proceed (NTP) request #23 for Phase I Overhead of Circuit (C) 440 of the Cleveland National Forest Power Line Replacement Projects (Project) was approved by the United States Forest Service (USFS) on June 28, 2019 and by the California Public Utilities Commission (CPUC) on July 11, 2019. Since this approval, San Diego Gas & Electric Company (SDG&E) has identified additional anchors needed to reduce blowout (i.e., horizontal movement of conductors) and access road modifications along Phase I Overhead of C440. A brief description and justification of the refinements are provided on page 2 of this MPR request.						ne 28, Diego ntal	
Attachments (check all that	t apj	ply):						
 ☒ Refinement Request Screening Form (See Attachment A: Minor Project Refinement Request Screening Form) 		☐ Photos See Attachment B: Comparison Map) Maps Moderate Moderate		See Attacl pacts Table				
Under Order 2 of the Decis Line Replacement Projects circumstances. In accordant (a) through (d).	(D .	16-05-038), the CF	PUC may	approve minor p	roject 1	refinemen	ts under c	ertain
(a) Is the proposed refinem area? The requested refinements ar Environmental Impact Report depicted in Figure ES-1 Regipartially within the baseline by hydrological, biological, and 2019, and 2020. Additional each applicable resource sect Screening Form.	te loo t/En onal oiolo cult deta	cated within the general Impact of Overview Map in ogical, cultural, and ural resources survils regarding the sp	ographic et Study (the Final hydrolo eys were ecific sur	boundary of the Fir EIR/EIS) study are EIR/EIS. The refir gical survey areas. conducted in 2016 eveys conducted are	nal a, whic nement Supple , 2017,	h is ts occur emental 2018,	□ Yes	⊠ No
(b) Will the proposed refine increase in the severity of a used in the EIR/EIS? A discussion of changes in si criteria used in the Final EIR area are fully analyzed in Att	pre gnif /EIS	viously identified icant impacts due to and is resource are	significa to the request-specific	nt impact based of uested refinements ic. The changes to	n the can be seen to b	riteria d on source	□ Yes	⊠ No
(c) Does the proposed refine or policy?	eme	nt conflict with an	ny mitiga	tion measure or a	pplicab	ole law	□ 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 the following refinements along Phase I Overhead of C440:		
 addition of two new anchors and an anchor work area at Pole P40062; addition of a new anchor and a temporary pole work area at Pole P40063; addition of a new anchor, anchor work area, and footpath at Pole P40069; 		

- addition of a new anchor, anchor work area, and rootpath at Pole P40009;
 reconfiguration of the approved construction-only access road located north of Pole P40069 to avoid cultural resources¹: and
- reclassification of approximately one mile of approved navigation access road between Poles P258396 and P45309 to a construction-only access road to allow for maintenance.²

Attachment B: Comparison Map depicts the data approved in NTP #23 in comparison to the requested refinements, as described in this MPR request. The activities associated with the construction and utilization of the refinements 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 1.50 acres of temporary impacts (of which approximately 0.01 acre is classified as native vegetation) and less than 0.01 acre of permanent impacts.³ 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:

- When the final engineering for Phase II of C440 was updated to address blowout due to potential weather conditions, it was determined that additional anchors would be required to reduce blowout along a small section of Phase I Overhead of C440.⁴ The additional work areas included with this MPR request are needed to facilitate the installation of these anchors.
- The construction-only access road located north of Pole P40069 needs to be reconfigured in order to avoid cultural resources that are located within the approved road. Moving the road to the west will avoid impacts to these resources.
- Due to saturated conditions and standing water, the navigation access road between Poles P258396 and P45309 needs to be reclassified as a construction-only access road to allow for maintenance. The maintenance will mitigate against future impacts (i.e., rutting and washboarding), as well as allow continued access for construction crews, equipment, the property owner, and the land manager.

03-21-20 Date refinement is expected to be implemented: **Resource Agency Coordination** Action **Documentation** Resource Agency Name Date (see attached if yes) Required ☐ Yes N/A N/A ⊠ No N/A N/A

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¹ The reconfigured construction-only access road will be located to the west of the approved location and will require minor tree trimming to allow equipment access. The reconfigured road is approximately 62 feet and the previously approved road is approximately 45 feet; therefore, the road will increase by approximately 17 feet and result in less than 0.01 acre of additional impacts to montane forest.

² Maintenance will include minor grading and import of fill material (i.e., native spoils from foundation work). No grading will be allowed along two sections of the road (a total of approximately 188 feet) due to cultural resources, as shown in Attachment B: Comparison Map.

³ Some refinements overlap with previously approved NTP components. The overlapping area is not included in the impact totals

⁴ Phase II of C440 will be included in an upcoming NTP request.

ATTACHMENT A: MINOR	R PROJECT REFINEMEN	T REQUEST SCREENING FOR	М

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	Not Applicable
Visual Resources (e.g., adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character of the site and its surroundings, create sources of light or glare, or result in an inconsistency with applicable scenic integrity objectives)? Final EIR/EIS evaluation ⁵ : Significant and unavoidable (Class I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Visual Resources:

The requested refinements will be consistent with the visual resource analysis in the Final EIR/EIS and will not impact scenic vistas or substantially affect existing views from a National Forest Scenic Byway (i.e., Sunrise Scenic Byway). The additional anchors, work areas, and access road modifications may impact the visual character of the surrounding areas due to minor vegetation removal and road maintenance; however, temporary impacts will be reduced with the implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to visual resources as identified in the Final EIR/EIS.

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⁵ 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	Not Applicable
Air Quality (e.g. produce additional emissions, conflict with 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 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 not located within 1,000 feet of sensitive receptors; therefore, the refinements will not expose sensitive receptors to substantial pollutant concentrations. With the implementation of APM AIR-01 through APM AIR-05, 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	×		
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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 were conducted along Phase I Overhead of Circuit (C) 440 in 2017, 2018, 2019, and 2020, and included a bat roost assessment, focused surveys for Townsend's big-eared bat (*Corynorhinus townsendii*) and all other bat species, focused surveys for special-status plants, and site verification surveys.

The requested refinements will result in a total of approximately 1.50 acres of temporary impacts and less than 0.01 acre of permanent impacts. This includes approximately 1.49 acres of total impacts (i.e., temporary and permanent impacts) to bare ground⁶ and approximately 0.01 acre of total impacts to montane forest.⁷ No trees will be removed, but minor tree trimming will occur. No special-status plants, 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 refinement areas. 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.

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⁶ Bare ground falls in the Agricultural/Disturbed/Developed/Bare Ground impact category for SDG&E's Subregional Natural Community Conservation Plan (NCCP).

⁷ Montane forest falls 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	Not Applicable
Cultural and Paleontological Resources (e.g., cause an adverse change to Traditional Cultural Properties or historical, archeological, or paleontological resources; or disturb any human remains)?			
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

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

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 2010. In addition, intensive supplemental pedestrian surveys of the refinement areas were conducted by ASM Affiliates, Inc. in 2016, 2017, 2019, and 2020. No new cultural resources were recorded during the supplemental surveys; four previously recorded resources were identified within four separate refinement areas. Environmentally sensitive area fencing has been installed at each cultural resource. In addition, archaeological and Native American monitors will be required during any ground-disturbing activities. Further, one of the refinements (i.e., the reconfiguration of the approved construction-only access road located north of Pole P40069) was developed to specifically avoid cultural resources at that location. Additional details on these cultural resources are included in a supplemental confidential cultural resources letter report, which will be submitted to the USFS in support of this MPR request. 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 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 refinements do not require excavation underlain by rock units with a PFYC Class 3 (i.e., 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.

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 the utilization of the requested refinement areas are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional minor vegetation removal and road maintenance 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	Not Applicable		
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)? Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse					
Summary of Proposed Minor Project Refinement Impacts o		•			
The requested refinements occur within the area assessed in the <i>Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California.</i> 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.					
not result in a new significant impact or a substantial increase in	the severity of a p	oreviously analyz	zed impact to		
not result in a new significant impact or a substantial increase in	the severity of a p	oreviously analyz	zed impact to		
not result in a new significant impact or a substantial increase in 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		_			
not result in a new significant impact or a substantial increase in 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)? Final EIR/EIS evaluation: Less than significant with mitigation					
not result in a new significant impact or a substantial increase in 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)? Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse	Fire and Fuels In Fire and Fuels In Fazard Severity Zootential risk of wild ce with the Project will not result in	Management: one, which was indifire ignition and it's Construction land a new significan	ncluded in the spread		
not result in a new significant impact or a substantial increase in 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)? Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse Summary of Proposed Minor Project Refinement Impacts of The requested refinements are located within the Very High Fire Fire and Fuels Management analysis in the Final EIR/EIS. The proposed with the refinement areas will be managed in complian Prevention/Protection Plan. Therefore, the requested refinements substantial increase in the severity of a previously analyzed impact of the severity of the severity of a previously analyzed impact of the severity of the severi	Fire and Fuels In Fire and Fuels In Fazard Severity Zootential risk of wild ce with the Project will not result in	Management: one, which was indifire ignition and it's Construction land a new significan	ncluded in the spread		

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. Supplemental water resource surveys of the refinement areas were conducted in 2018 and 2020. 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 C440, C442, C449, Transmission Line (TL) 629C, and TL6958 Storm Water Pollution Prevention Plan (Waste Discharge Identification #9 37C3381630) 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	Not Applicable
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 In accordance with the Construction Notification Plan and MM LU Overhead of C440 were notified of construction activities associate. The property owners within 1,000 feet of the requested refinement requested refinements will not introduce a new land use, establish or create a physical division or separation of use. In addition, the applicable land use plans, policies, or regulations of an agency we located in the same County of San Diego land use and zoning desEIR/EIS. Therefore, the requested refinements will not result in in the severity of a previously analyzed impact to land use as idea.	J-1, property owned with Notice to a swere included in a permanent bare requested refine ith jurisdiction over signations that we new significant in	Proceed #23 on J that notification rrier or obstacle leads will not cover the Project, a tree analyzed in the projects or a substantial	une 12, 2019. process. The petween uses, onflict with the s they are ne Final
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 Construction-related noise will be generated within the requested vegetation removal, road maintenance, and large equipment oper section, the refinement areas are not located within 1,000 feet of sen noise levels will not disturb sensitive receptors. With the implement impacts from construction activities associated with the refinement a Final EIR/EIS. Therefore, the requested refinements will not result increase in the severity of a previously analyzed impact to noise	refinement areas ation. As stated p sitive receptors; th ation of noise-rela areas will be equiv- lit in a new signification.	reviously in the A erefore, temporar ted MMs and AP alent to those ana icant impact or a	Air Quality y increases in Ms, noise lyzed in the substantial
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 The requested refinements will be consistent with the public servand will not require new or expanded public facilities or services result in a new significant impact or a substantial increase in the public services and utilities as identified in the Final EIR/EIS.	ices and utilities at. Therefore, the r	analysis in the Fi equested refinen	nents will not

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	Not Applicable
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			
C CD INC D'ADO AT A	D 4*		

Summary of Proposed Minor Project Refinement Impacts on Recreation:

The requested refinement areas will be located within and adjacent to the approved Phase I Overhead of C440 alignment and near the Laguna Mountain Recreation Area. Use of the refinement areas will not reduce or preclude access or visitation to facilities within the Laguna Mountain Recreation Area, nor will it increase the possibility of unauthorized access to specially designated or restricted areas. Therefore, with implementation of the previously mentioned APMs, 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)? Final EIR/EIS evaluation: Less than significant with mitigation		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

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

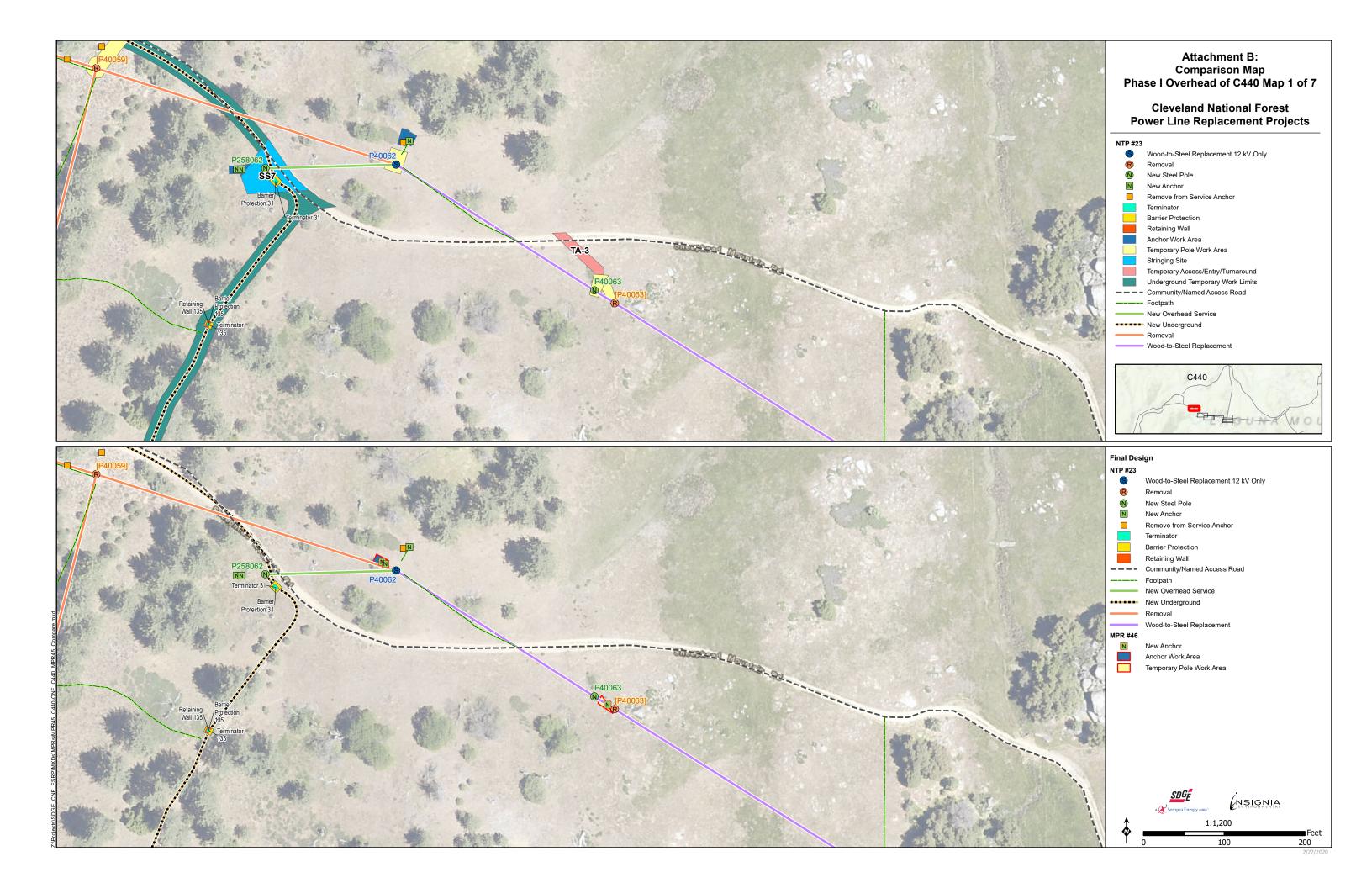
The requested refinements will not require additional or different types of construction vehicles or equipment than those discussed in the Final EIR/EIS. In addition, the total number of truck trips associated with construction of the Project will not change, and the use of the requested refinement areas will affect the same roadways as those analyzed in the Final EIR/EIS (i.e., Sunrise Highway and Sheephead Mountain Road), 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)⁸ 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.

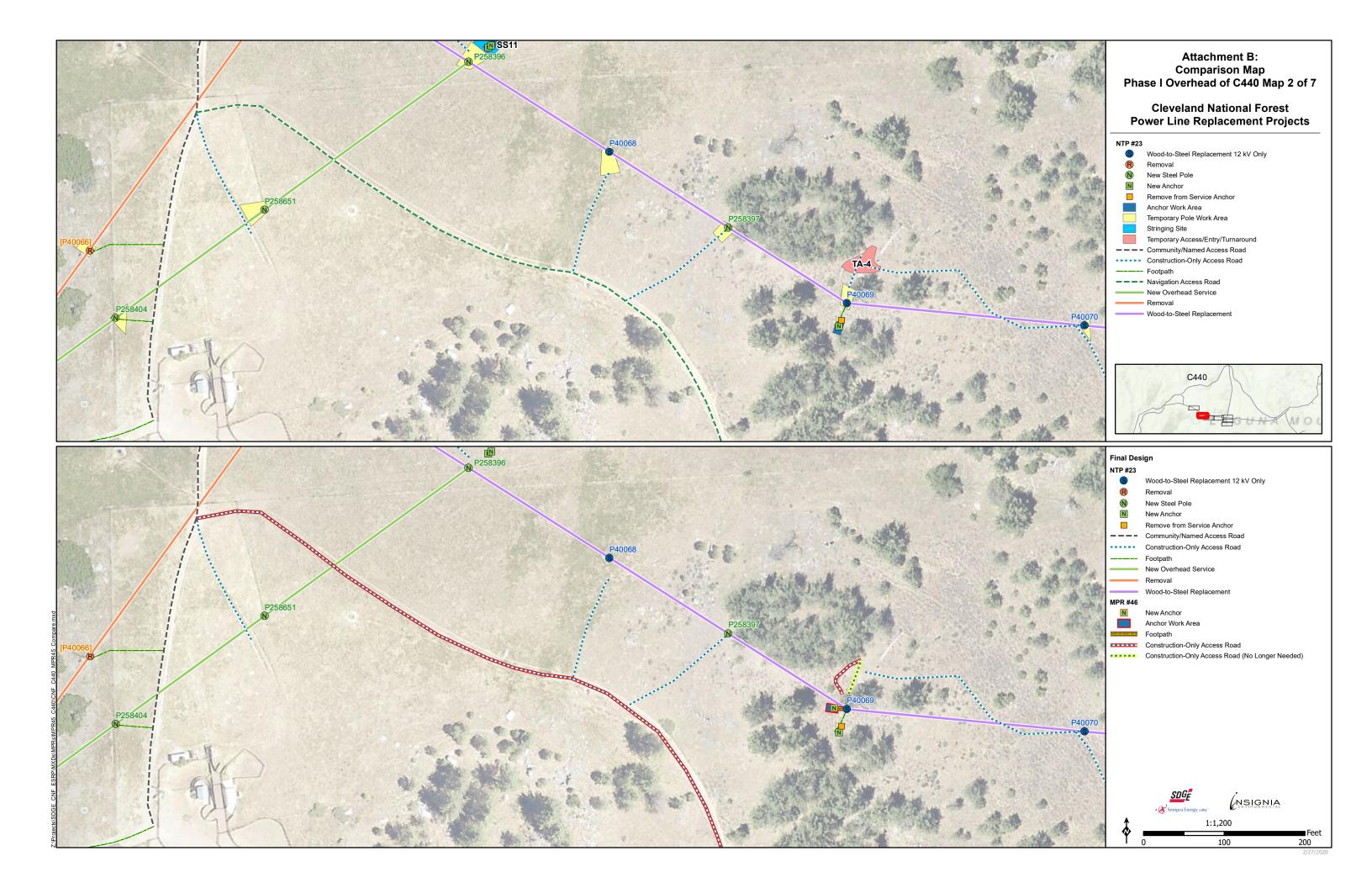
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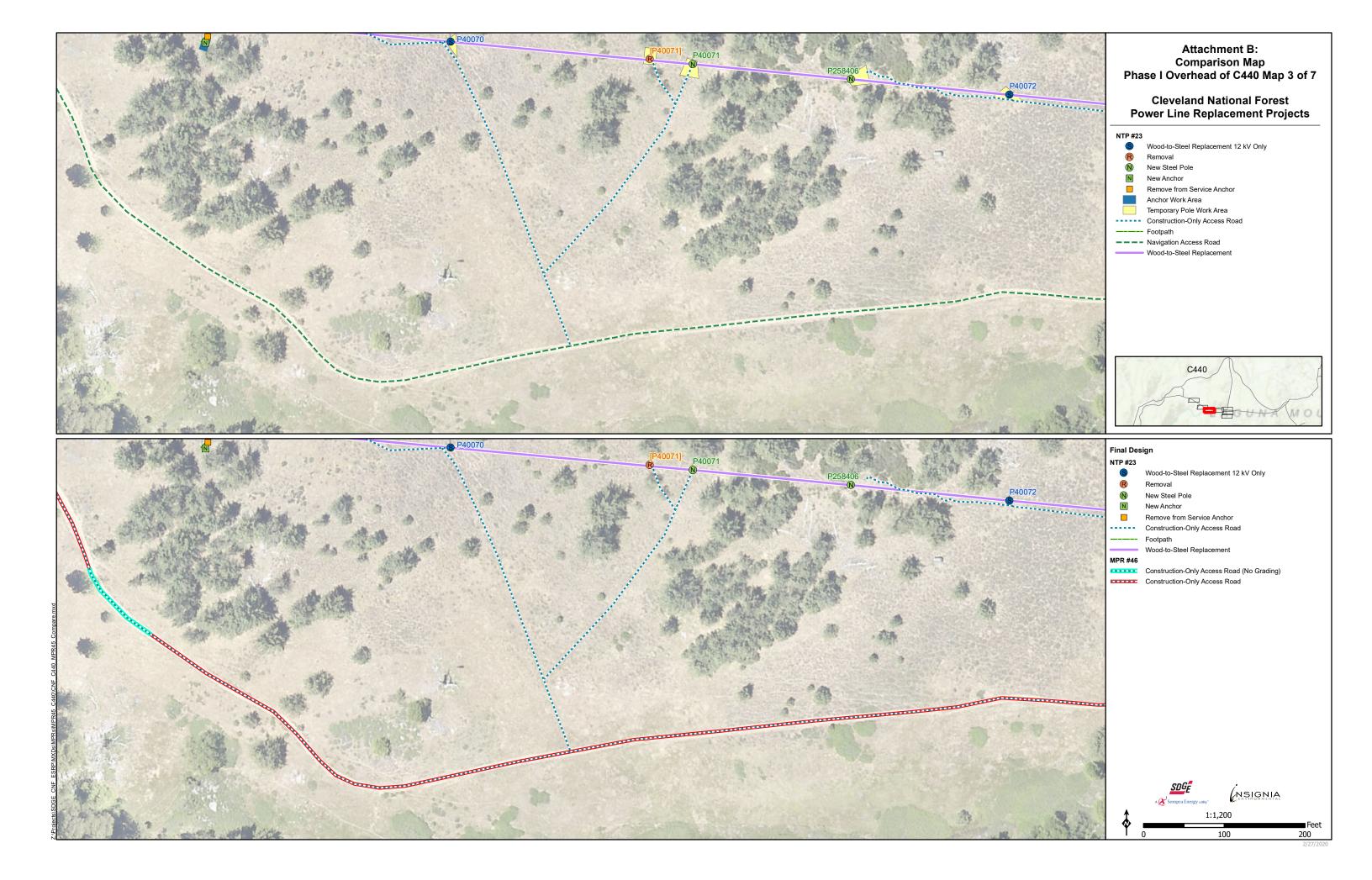
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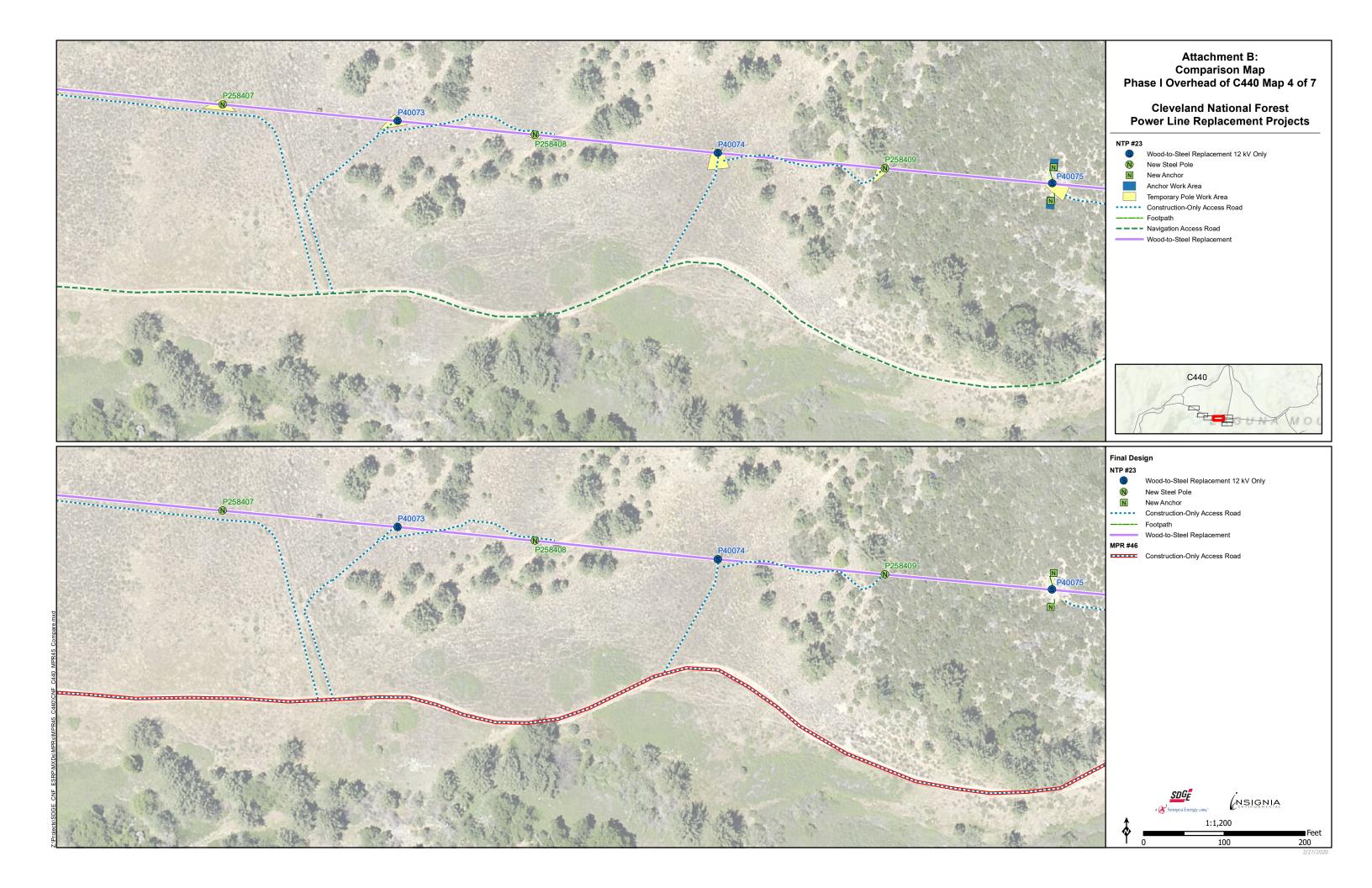
⁸ Sunrise Highway has an LOS of A through C. An LOS does not exist for Sheephead Mountain Road and the smaller private roads.

ATTACHMENT B: COMPARISON MAP

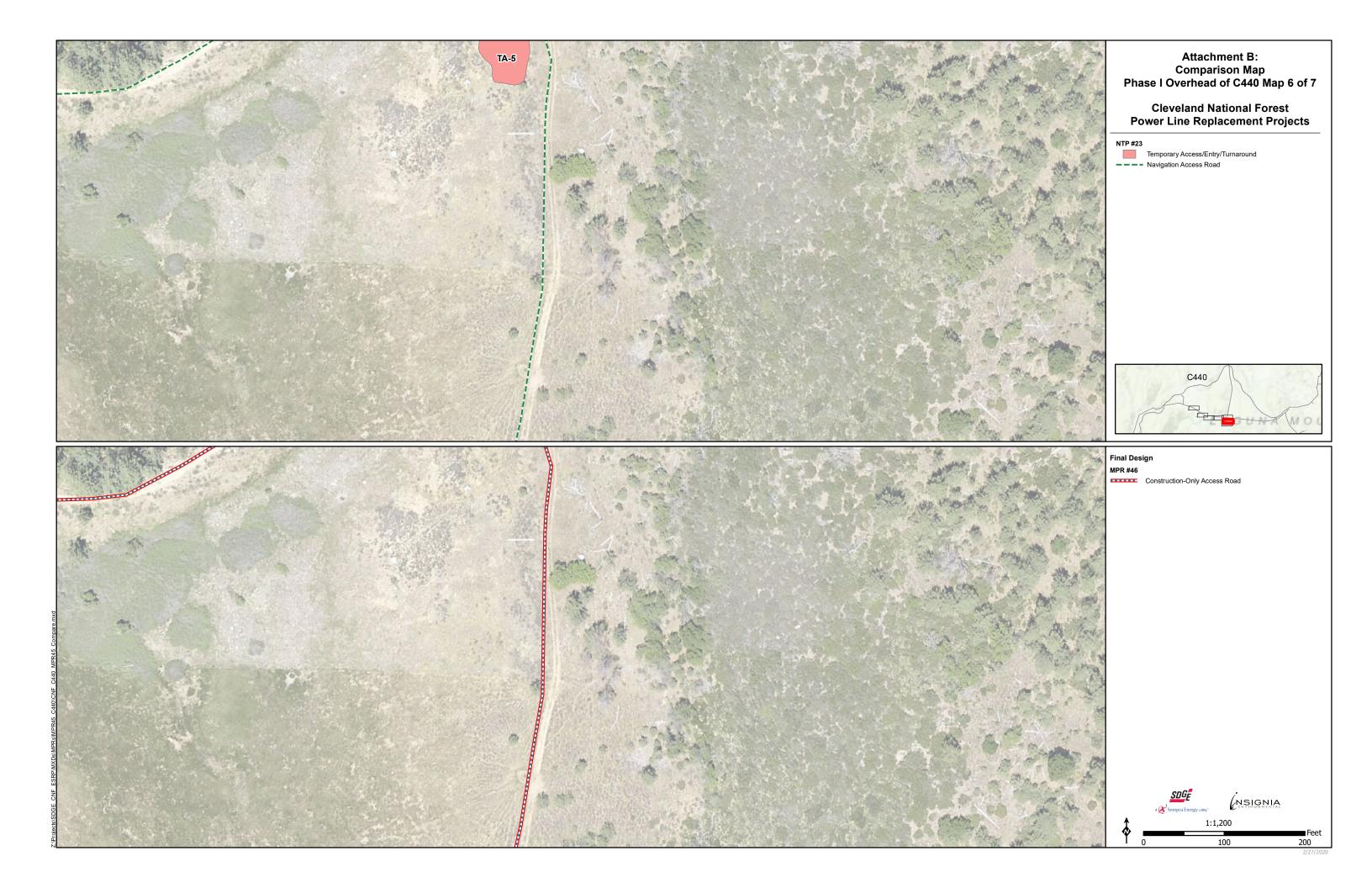


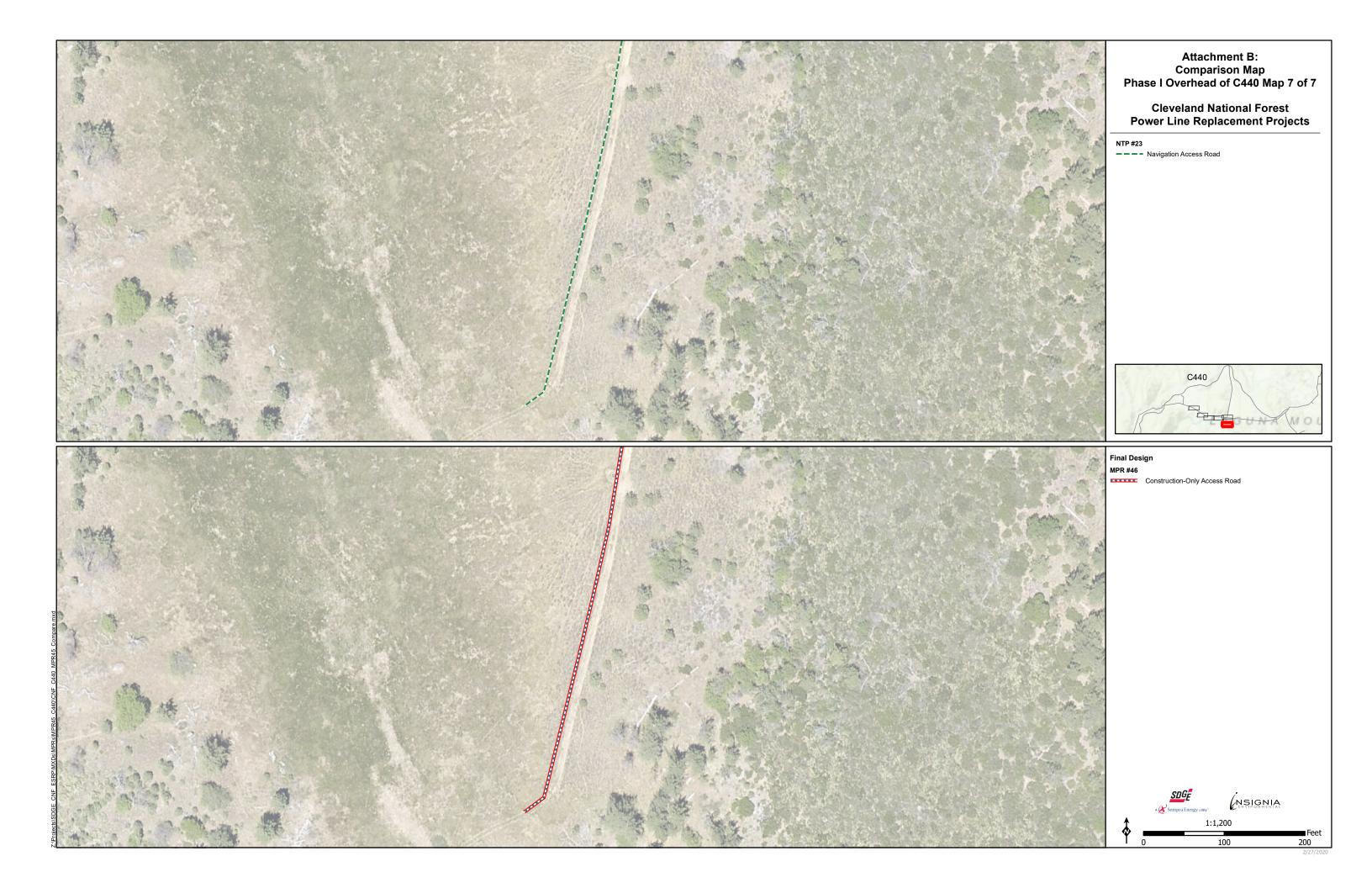












ATTACHMENT C: IMPACTS TABLE

ATTACHMENT C: IMPACTS TABLE

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

Table 1: Impacts Table

Impact Location	Approximate Impacts (acres)					
	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground			
Permanent Impacts						
Anchors	< 0.01					
Total	<0.01					
Temporary Impacts						
Access Roads ¹	< 0.01		1.49			
Anchor Work Areas	0.01					
Pole Work Areas	< 0.01					
Total	0.01		1.49			
MPR #46 Total ²	0.01		1.49			

¹ 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.

² Some refinements overlap with previously approved NTP components. The overlapping area is not included in the impact totals.