



# CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS



## MINOR PROJECT REFINEMENT REQUEST FORM

<b>Date Submitted:</b>	05-09-17	<b>Request #:</b>	005	
<b>Date Approval Required:</b>	05-30-17	<b>Landowner:</b>	Various	
<b>APN:</b>	XXX-XXX-XX, XXX-XXX-XX			
<b>Refinement from (check all that apply):</b>				
<input type="checkbox"/> Mitigation Measure	<input type="checkbox"/> APM	<input checked="" type="checkbox"/> Project Description	<input checked="" type="checkbox"/> Drawing	<input type="checkbox"/> Other
<b>Identify source (mitigation measure, project description, etc.):</b>				
<p>San Diego Gas &amp; Electric Company's (SDG&amp;E's) response to Data Request #10 was submitted to the California Public Utilities Commission (CPUC) in April 2015. The data request response included Attachment B.6 C78 Route Map for the Cleveland National Forest Power Line Replacement Projects (Project), which depicted approved facilities, stringing sites, access roads, and anchors for the distribution line. Page B-18 and page B-19 of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) describe the components of Circuit (C) 78, and page B-44 through page B-47 describe the Project's temporary workspace requirements for access, staging areas, stringing sites, and fly yards.</p> <p>The information in this Minor Project Refinement (MPR) request form discusses the following requested refinements along C78:</p> <ul style="list-style-type: none"> <li>• addition of permanent guy anchors;</li> <li>• addition of a fly yard and a staging area;</li> <li>• addition of existing navigation roads;</li> <li>• replacement of existing tap poles;</li> <li>• addition of new steel poles, as well as the elimination of proposed new steel poles;</li> <li>• addition of a wood-to-steel replacement pole;</li> <li>• addition of pole top work; and</li> <li>• reconfiguration and addition of stringing sites.</li> </ul> <p>A brief description of the refinements is provided on page 2 of this MPR request. In addition, a list of refinements and the reason for each is provided in Attachment A: Refinement Table and Impacts Table and depicted in Attachment D: Comparison Map.</p>				

<b>Attachments (check all that apply):</b>			
<input checked="" type="checkbox"/> Refinement Request Screening Form (see Attachment C: Minor Project Refinement Request Screening Form)	<input type="checkbox"/> Photos	<input checked="" type="checkbox"/> Maps (see Attachment B: Survey Area Map; Attachment D: Comparison Map)	<input checked="" type="checkbox"/> Other (see Attachment A: Refinement Table and Impacts Table)
<b>Under Order 2 of the Decision Granting SDG&amp;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).</b>			
<b>(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area?</b> No. The requested refinements are located within the geographic boundary of the Final EIR/EIS study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. Baseline hydrology, biological, and cultural resources studies were conducted as described in the Final EIR/EIS; however, some of the refinement areas occur outside of the baseline survey areas. As a result, supplemental hydrology, biological, and cultural resources surveys of the refinement areas were also conducted in 2016 and 2017. In accordance with the Project’s Mitigation Monitoring, Compliance, and Reporting Program and as part of the Pre-activity Study Report process, supplemental surveys included focused surveys for the entire alignment, as well as additional surveys for the refinement areas that occur outside of the baseline survey areas. Attachment B: Survey Area Map depicts the boundaries of the baseline survey areas and supplemental survey areas. Additional details regarding the specific surveys conducted can be found in each applicable resource section in Attachment C: Minor Project Refinement Request Screening Form.			
<b>(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?</b> No. Attachment C: Minor Project Refinement Request Screening Form provides a detailed assessment.			
<b>(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?</b> No.			
<b>(d) Does the proposed refinement trigger an additional permit requirement?</b> No. No new permit not previously contemplated in the Final EIR/EIS will be needed.			
<b>Describe refinement being requested (attach drawings and photos as needed):</b>			
Attachment D: Comparison Map depicts the preliminary C78 alignment (as shown in the Final EIR/EIS and Data Request #10) in comparison with the final design of C78, as described in this MPR request. As part of the final design, SDG&E requests the following refinements for C78: <ul style="list-style-type: none"> <li>• addition of 35 permanent guy anchors;</li> <li>• addition of the C78 Fly Yard and one staging area for helicopter use and materials storage;</li> <li>• addition of six existing navigation roads for access to various poles and work areas (no vegetation clearing or ground disturbance is required);</li> <li>• replacement of five existing tap poles;</li> <li>• addition of three new steel poles and the elimination of two proposed new steel poles from the final design;</li> <li>• addition of one wood-to-steel replacement pole;</li> <li>• addition of pole top work to Pole P172713; and</li> <li>• reconfiguration of three approved stringing sites and the addition of five stringing sites.</li> </ul> <p>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, operation, and maintenance of the Project. A list of the refinements and a description of the need for each is included in Attachment A: Refinement Table and Impacts Table.</p>			

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

The minor refinements described in this MPR request are a result of the final distribution circuit design that was developed based on the preliminary alignment presented in the Final EIR/EIS and Data Request #10. SDG&E submitted a response to Data Request #10 in April 2015 once the preliminary design contained sufficient detail to address the requested information. However, SDG&E conducted constructability reviews in 2016 and continued to refine the engineering design to better position stringing sites, confirm anchor positions, and finalize pole installation and replacement work. Additionally, SDG&E identified the need for more temporary workspace for pole access and construction material staging. As a result, minor refinements to the preliminary alignment (as identified in the Final EIR/EIS) were deemed necessary for anchors, poles, stringing sites, access roads, and fly/staging yards. A list of the refinements and a description of the need for each is included in Attachment A: Refinement Table and Impacts Table.

**Date refinement is expected to be implemented:** 05-31-17

**Resource Agency Coordination**

<b>Resource Agency</b>	<b>Name</b>	<b>Action Required</b>	<b>Date</b>	<b>Documentation (see attached if yes)</b>	
Not Applicable (N/A)	N/A	N/A	N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No



**ATTACHMENT A: REFINEMENT TABLE AND IMPACTS TABLE**



## ATTACHMENT A: REFINEMENT TABLE AND IMPACTS TABLE

Table 1: Refinement Table lists each refinement alphabetically for Circuit (C) 78 as part of the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest Power Line Replacement Projects (Project). The refinements are a result of the Project's final design and a brief explanation of the need for each refinement is included. This table also includes the temporary and permanent impacts associated with the requested refinements by type.

Table 2: Impacts Table lists the temporary impacts of this Minor Project Refinement (MPR) request as well as temporary impacts for the Project to date by vegetation type and workspace type.

**Table 1: Refinement Table**

Facility/Location	Compare Map Number	Refinement	Need for Refinement
Anchor (A-) 1	Page 1 of 16	One new anchor was added in association with P877040	Reinstallation of the anchor is required due to minor relocation and movement of the tap pole. The shift in location of the structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchor.
A-2 through A-3	Page 1 of 16	Two new anchors were added in association with P172686	Reinstallation of the anchors are required due to minor relocation and movement of the steel distribution structure. The shift in location of the distribution structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchors.
A-4	Page 1 of 16	One new anchor was added in association with P257727	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-5	Page 1 of 16	One new anchor was added in association with P172688	Reinstallation of the anchor is required due to minor relocation and movement of the steel distribution structure. The shift in location of the structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchor.
A-6 and A-7	Page 2 of 16	Two new anchors were added in association with P970336	Reinstallation of the anchors are required due to minor relocation and movement of the tap pole. The shift in location of the structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchors.
A-8 and A-9	Page 2 of 16	Two new anchors were added in association with P172689	Reinstallation of the anchors are required due to minor relocation and movement of the steel distribution structure. The shift in location of the distribution structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchors.
A-10 through A-13	Page 2 of 16	Four new anchors were added in association with P172690	Reinstallation of the anchors are required due to minor relocation and movement of the steel distribution structure. The shift in location of the distribution structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchors.
A-14 and A-15	Page 2 of 16	Two new anchors were added in association with P172691	Reinstallation of the anchors are required due to minor relocation and movement of the steel distribution structure. The shift in location of the distribution structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchors.
A-16	Page 3 of 16	One new anchor was added in association with P257728	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-17	Page 3 of 16	One new anchor was added in association with P107769	Reinstallation of the anchor is required due to minor relocation and movement of the tap pole. The shift in location of the structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchor.
A-18	Page 4 of 16	One new anchor was added in association with P257737	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-19	Page 7 of 16	One new anchor was added in association with P257743	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-20	Page 7 of 16	One new anchor was added in association with P257745	Installation of the anchor is required due to the installation of a new steel distribution pole.

Facility/Location	Compare Map Number	Refinement	Need for Refinement
A-21	Pages 8 & 9 of 16	One new anchor was added in association with P257750	Reinstallation of the anchor is required due to minor relocation and movement of the steel distribution structure. The shift in location of the structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchor.
A-22	Page 9 of 16	One new anchor was added in association with P257752	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-23	Pages 9 & 10 of 16	One new anchor was added in association with P257753	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-24 and A-25	Page 12 of 16	Two new anchors were added in association with P257760	Installation of the anchors are required due to the installation of a new steel distribution pole.
A-26	Page 11 & 12 of 16	One new anchor was added in association with P257761	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-27	Page 12 of 16	One new anchor was added in association with P257764S	Installation of the anchor is required due to the installation of a new stub pole.
A-28	Page 12 of 16	One new anchor was added in association with P257763	Installation of the anchor is required due to the installation of a new steel distribution pole.
A-29	Pages 12 and 14 of 16	One new anchor was added in association with P257765S	Installation of the anchor is required due to the installation of a new stub pole.
A-30	Pages 12 and 14 of 16	One new anchor was added in association with P172710	Reinstallation of the anchor is required due to minor relocation and movement of the steel distribution structure. The shift in location of the structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchor.
A-31 through A-34	Page 13 of 16	Four new anchors were added in association with P172711	Reinstallation of the anchors are required due to minor relocation and movement of the steel distribution structure. The shift in location of the distribution structure introduces new angles and tension, which in some cases cannot adequately support the change in tension without reinstallation of the anchors.
A-35	Page 13 of 16	One new anchor was added in association with P257766	Installation of the anchor is required due to the installation of a new steel distribution pole.
<b>Temporary Impacts: 0.02 acre (0.01 acre of Diegan Coastal Sage Scrub, &lt;0.01 acre of Southern Mixed Chaparral, and &lt;0.01 acre of disturbed/developed areas)</b>			
<b>Permanent Impacts: &lt;0.01 acre (&lt;0.01 acre of Diegan Coastal Sage Scrub, Southern Mixed Chaparral, and disturbed/developed areas)</b>			
C78 Fly Yard	Page 16 of 16	Addition of a new fly yard/staging area, measuring approximately 0.23 acre	The fly yard is being added to accommodate helicopter take-off and landing for transportation of construction materials and equipment, as well as provide temporary storage, during construction of C78.
<b>Temporary Impacts: 0.23 acre of disturbed/developed area</b>			
<b>Permanent Impacts: 0.00 acre</b>			
Navigation Road (NR-) 1	Page 1 of 16	Addition of an existing navigation access road	The existing navigation access road is being added to allow equipment and vehicle access to Poles P877040, P172686, and P257727.
NR-2	Page 1 of 16	Addition of an existing navigation access road	The existing navigation access road is being added to allow equipment and vehicle access to Pole P172687.
NR-3	Page 1 of 16	Addition of an existing navigation access road	The existing navigation access road is being added to allow equipment and vehicle access to Pole P257776.
NR-4	Page 1 of 16	Addition of an existing navigation access road	The existing navigation access road is being added to allow equipment and vehicle access to Pole P878596.
NR -5	Pages 12, 13, 14, 15 & 16 of 16	Addition of an existing navigation access road	The existing navigation access road is being added to allow equipment and vehicle access to Fly Yard-1.



Facility/Location	Compare Map Number	Refinement	Need for Refinement
NR -6	Page 13 of 16	Addition of an existing navigation access road	The existing navigation access road is being added to allow equipment and vehicle access to Staging Area-1 and Poles P172711 and P257766.
<b>Temporary Impacts: 0.00 acre (navigation roads do not require maintenance)</b>			
<b>Permanent Impacts: 0.00 acre (navigation roads do not require maintenance)</b>			
P877040	Page 1 of 16	Wood-to-steel replacement of an existing tap pole	Wood-to-steel replacement of the existing tap pole is required due to the minor relocation and movement of the distribution structures. The shifted distribution structures introduce new angles and tension, which requires replacement of the tap pole due to the change in tension.
P257727	Page 1 of 16	Addition of a new steel pole	Pole P257727 is being added due to final engineering of C78.
P878596	Page 1 of 16	Wood-to-steel replacement of an existing tap pole	Wood-to-steel replacement of the existing tap pole is required due to the minor relocation and movement of the distribution structures. The shifted distribution structures introduce new angles and tension, which requires replacement of the tap pole due to the change in tension.
P970336	Page 2 of 16	Wood-to-steel replacement of an existing tap pole	Wood-to-steel replacement of the existing tap pole is required due to the minor relocation and movement of the distribution structures. The shifted distribution structures introduce new angles and tension, which requires replacement of the tap pole due to the change in tension.
P-38	Page 2 of 16	Elimination of the proposed new steel pole from the Project	P-38 is no longer needed due to final engineering of C78.
P-37	Page 2 of 16	Elimination of the proposed new steel pole from the Project	P-37 is no longer needed due to final engineering of C78.
P172691	Page 2 of 16	Wood-to-steel replacement of an existing tap pole	Pole P172691, which is an existing tap pole, was proposed for removal in the 2015 baseline data. However, due to the requirements of an existing customer in the area, the pole needs to be replaced.
P107769	Page 3 of 16	Wood-to-steel replacement of an existing tap pole	Pole P107769, which is an existing tap pole, was displayed as a distribution pole and proposed for a wood-to-steel replacement in the 2015 baseline data. The pole will still be a wood-to-steel replacement, but it is now identified as a tap pole.
P257739	Page 5 of 16	Addition of a new steel pole	Pole P257739 is being added due to final engineering of C78.
P172711	Page 13 of 16	Wood-to-steel replacement of an existing distribution pole	This pole is part of C78, but was inadvertently excluded from the 2015 baseline data. Therefore, the pole is being replaced to complete the fire-hardening of C78.
P257766	Page 13 of 16	Addition of a new steel pole	Pole P257766 is being added due to final engineering of C78.
P172713	Page 13 of 16	Addition of pole top work to Pole P172713	Pole top work is required to tie Pole P172713 into C78 once it is fire-hardened.
<b>Temporary Impacts: 0.1 acre (0.03 acre of Diegan Coastal Sage Scrub, 0.01 acre of Southern Mixed Chaparral, and 0.06 acre of disturbed/developed areas)</b>			
<b>Permanent Impacts: &lt;0.01 acre (&lt;0.01 acre of Diegan Coastal Sage Scrub, Southern Mixed Chaparral, and disturbed/developed areas)</b>			
Stringing Site (SS-) 1	Page 1 of 16	Reconfiguration of the approved stringing site dimensions and size from approximately 0.01 acre to 0.05 acre	The stringing site is being expanded to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
SS-2	Pages 2 & 3 of 16	Addition of a new stringing site, measuring approximately 0.10 acre	The stringing site is being added to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
SS-3	Page 5 of 16	Addition of a new stringing site, measuring approximately 0.06 acre	The stringing site is being added to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.

Facility/Location	Compare Map Number	Refinement	Need for Refinement
SS-4	Pages 9 & 10 of 16	Addition of a new stringing site, measuring approximately 0.08 acre	The stringing site is being added to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
SS-5	Page 12 of 16	Addition of a new stringing site, measuring approximately 0.08 acre	The stringing site is being added to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
SS-6	Page 12 of 16	Reconfiguration of the approved stringing site dimensions and size from approximately 0.01 acre to 0.03 acre	The stringing site is being expanded to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
SS-7	Pages 12 & 14 of 16	Reconfiguration of the approved stringing site dimensions and size from approximately 0.02 acre to 0.03 acre	The stringing site is being expanded to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
SS-8	Page 13 of 16	Addition of a new stringing site, measuring approximately 0.05 acre	The stringing site is being added to better align with the final engineering and provide more adequate pulling tensions. Additionally, the stringing site better aligns with the distribution, which reduces pulling tensions and helps prevent potential stringing operation complications and conductor damage.
<b>Temporary Impacts: 0.48 acre (0.01 acre of Southern Mixed Chaparral and 0.47 acre of disturbed/developed areas)</b>			
<b>Permanent Impacts: 0.00 acre</b>			
Staging Area-1	Page 13 of 16	Addition of a new staging area, measuring approximately 0.05 acre	The staging area is being added to facilitate parking and the storage of construction materials and equipment.
<b>Temporary Impacts: 0.05 acre of disturbed/developed areas</b>			
<b>Permanent Impacts: 0.00 acre</b>			
<b>C78 Total Temporary Refinement Impacts: 0.88 acre</b>			
<b>C78 Total Permanent Refinement Impacts: &lt;0.01 acre</b>			

**Table 2: Impacts Table**

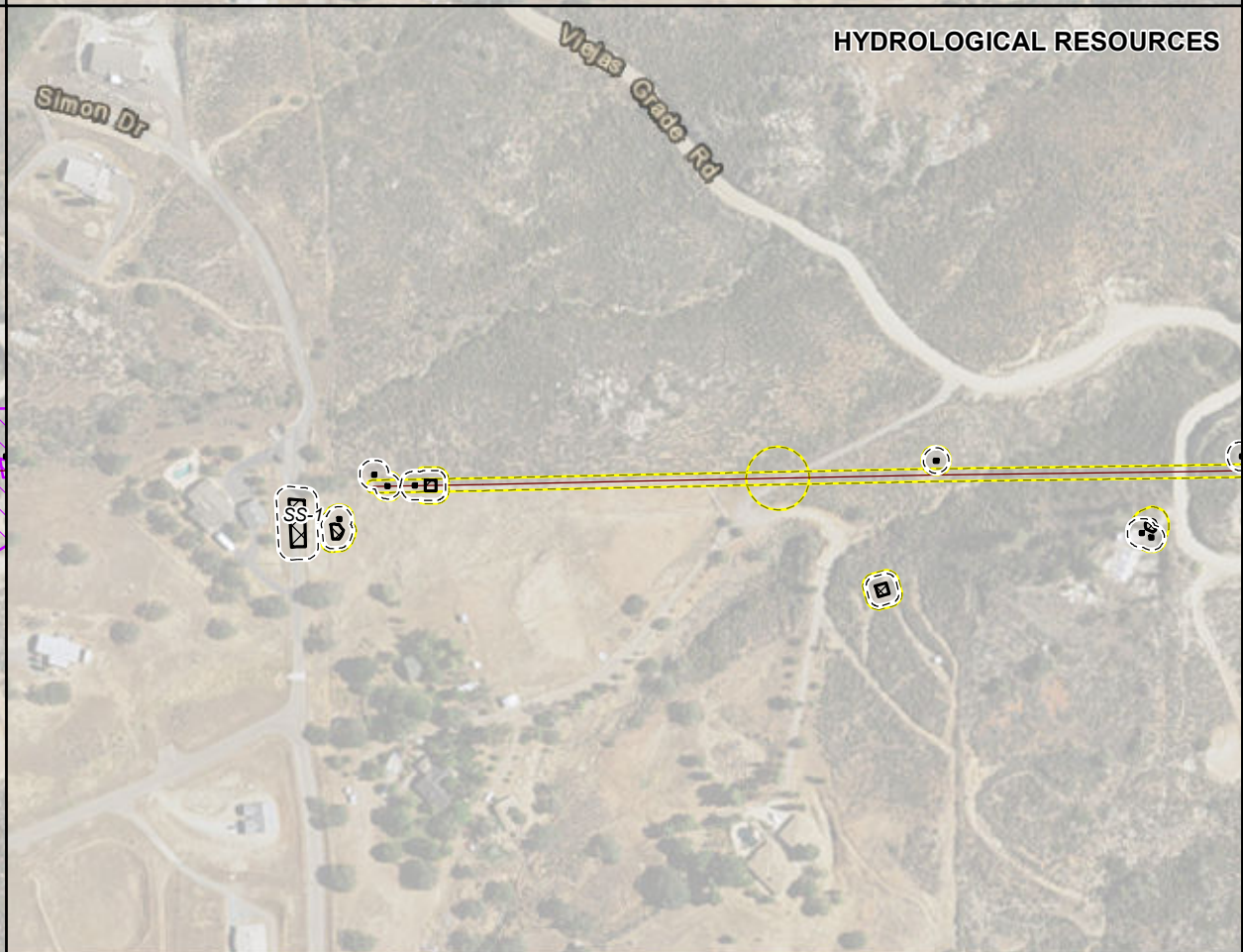
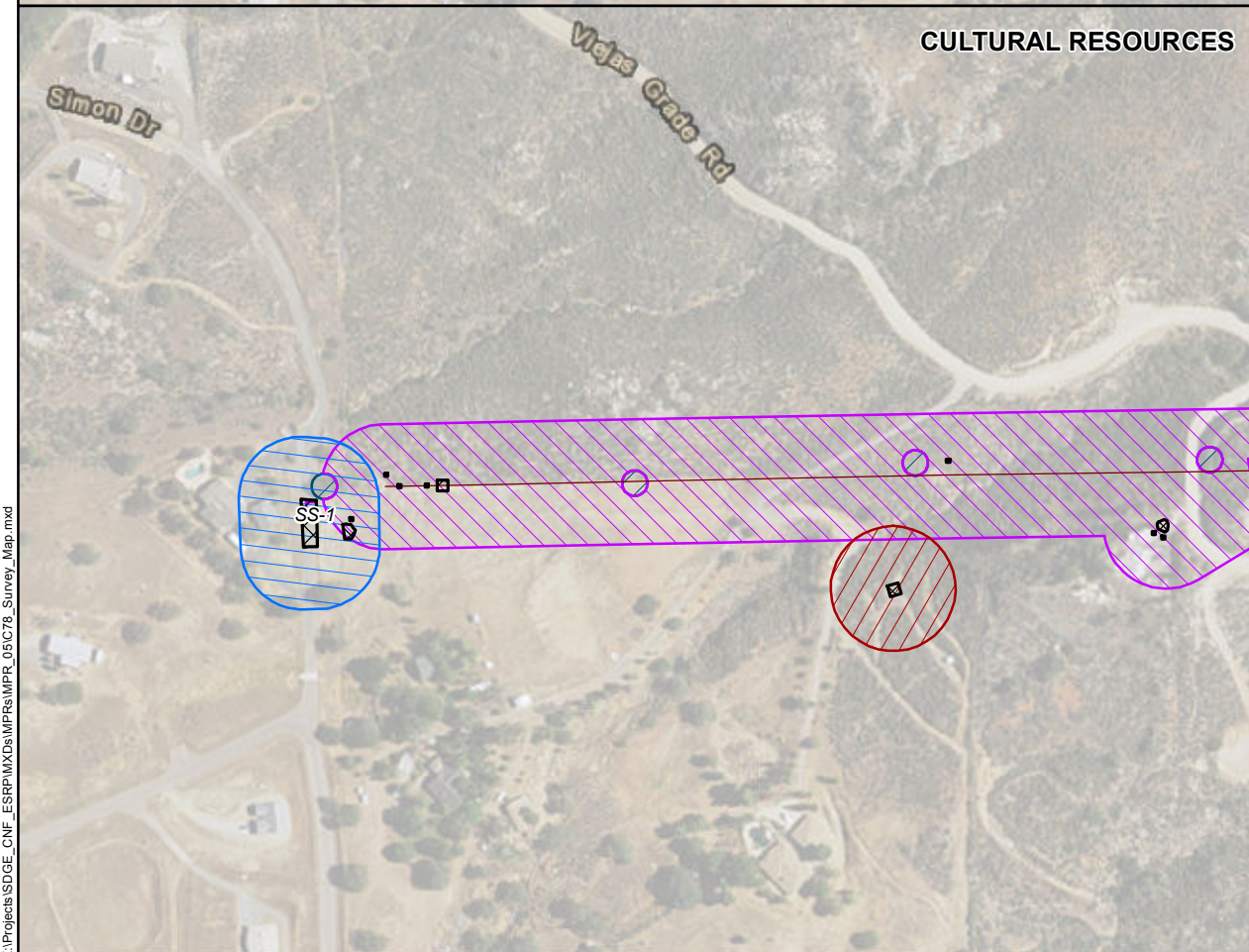
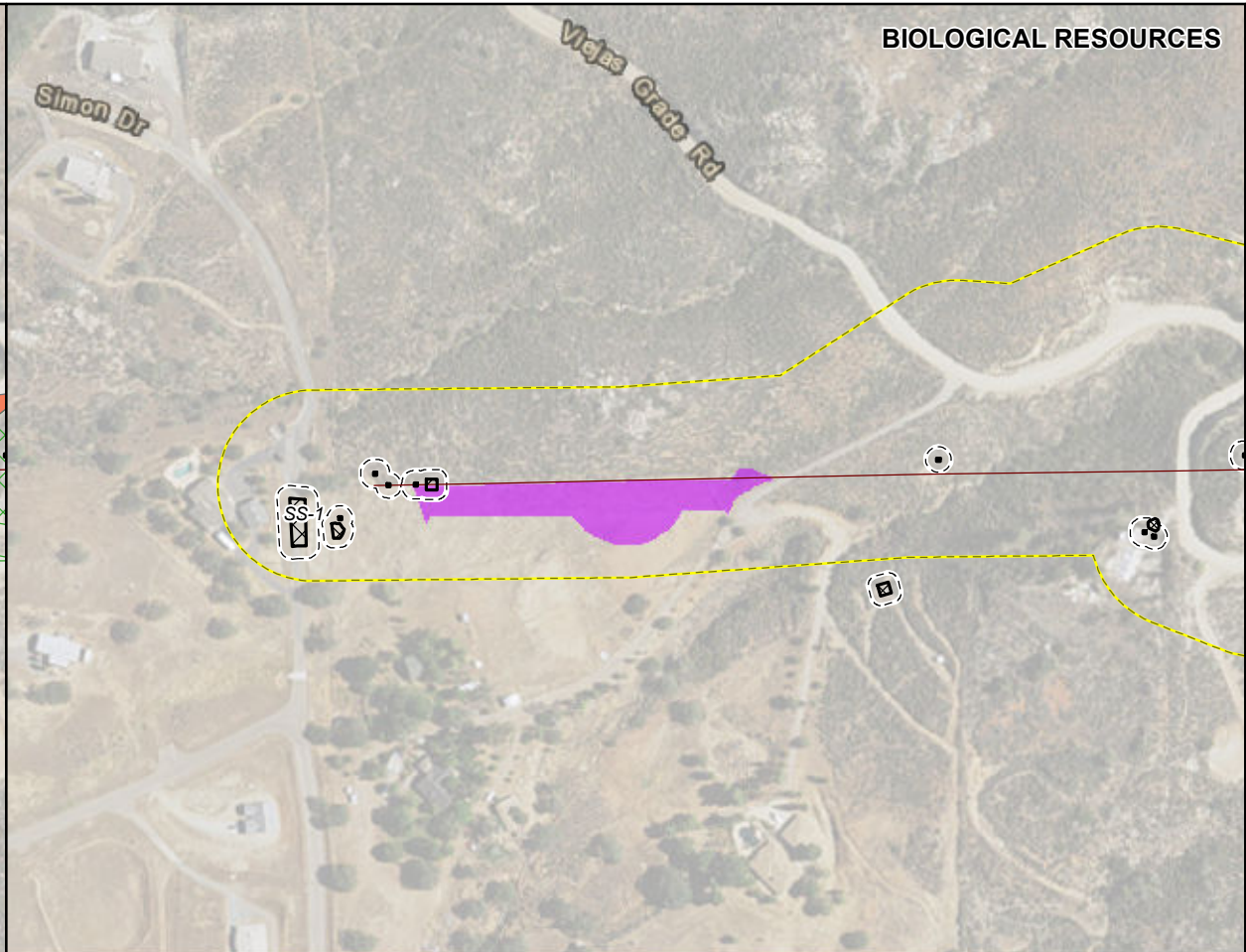
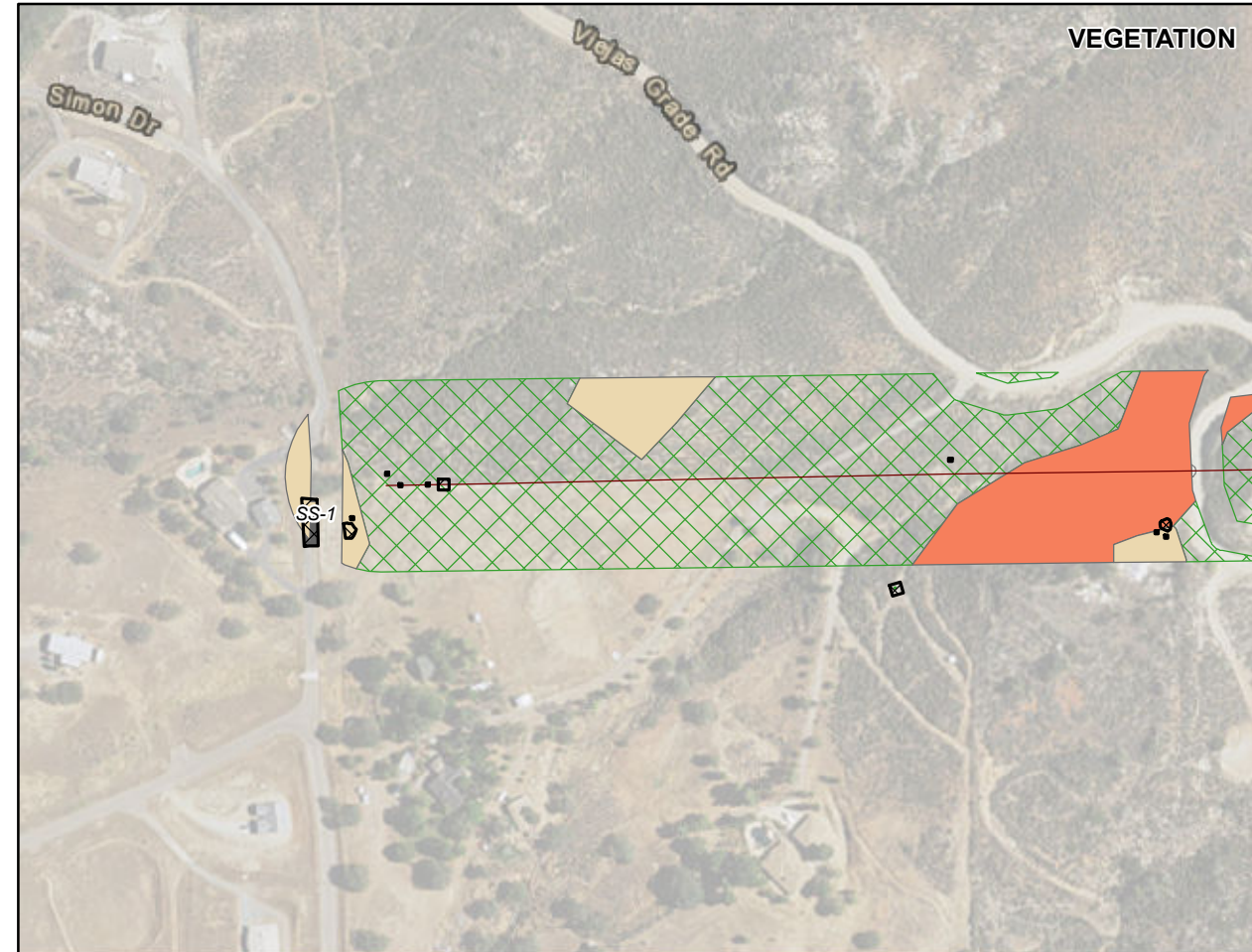
<b>Temporary Impact Location</b>	<b>Native Vegetation (Acres)</b>	<b>Non-Native Grassland</b>	<b>Agricultural/Disturbed/Developed/Bare Ground (Acres)</b>
Anchor Work Area	<0.02	--	<0.01
Pole Work Areas	0.04	--	0.06
Stringing Sites	0.01	--	0.47
Staging Area	--	--	0.05
C78 Fly Yard	--	--	0.23
<b>Project Total to Date<sup>1</sup></b>	13.07	14.30	43.11

<sup>1</sup> The total temporary acreage for the Project includes this MPR as well as Revised Notice To Proceed (NTP) #1, MPR #1, MPR #2, NTP #2, pending MPR request #4, and pending NTP request #4. Temporary impacts due to outrigger adjustments and workspace adjustments will be totaled following completion of construction on each component. Currently, there are no components where construction is complete.



**ATTACHMENT B: SURVEY AREA MAP**

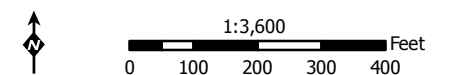
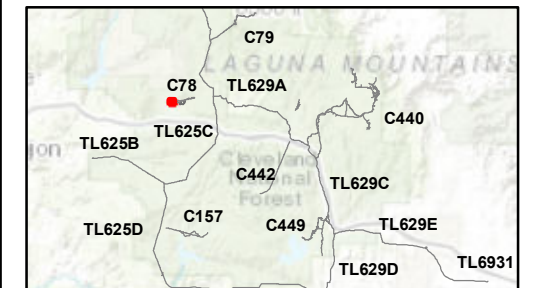




## Attachment B: Survey Area Map C78 Map 1 of 9

### Cleveland National Forest Power Line Replacement Projects

- C78
- ▣ MPR Work Area
- - - 2016 Biological/Hydrological Survey Area
- ▭ Baseline Biological/Hydrological Survey Area
- Cultural Survey Areas by Year**
- ▨ 2008
- ▨ 2011
- ▨ 2015
- ▨ 2017
- Vegetation**
- ▨ Diegan Coastal Sage Scrub
- ▨ Disturbed (Ruderal/Barren)
- ▨ Road
- ▨ Southern Mixed Chaparral
- ▨ Urban and Developed/Ornamental Landscaping
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
- ▨ Plantago erecta



VEGETATION

BIOLOGICAL RESOURCES

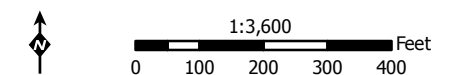
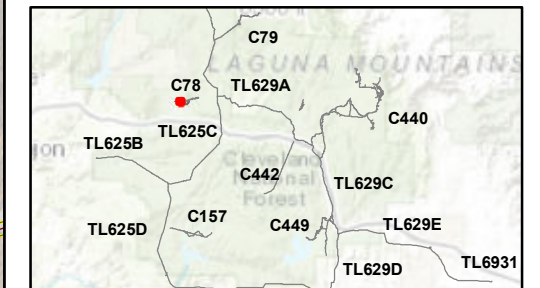
Attachment B: Survey Area Map  
C78 Map 2 of 9

Cleveland National Forest  
Power Line Replacement Projects

CULTURAL RESOURCES

HYDROLOGICAL RESOURCES

- C78
- ▨ 2015 Hermes Copper Butterfly Survey Area
- ▨ MPR Work Area
- - - 2016 Biological/Hydrological Survey Area
- ▭ Baseline Biological/Hydrological Survey Area
- Cultural Survey Areas by Year**
- ▨ 2008
- ▨ 2011
- Vegetation**
- ▭ Bare Ground
- ▨ Diegan Coastal Sage Scrub
- ▨ Disturbed (Ruderal/Barren)
- ▭ Southern Mixed Chaparral
- ▭ Urban and Developed/Ornamental Landscaping
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
- ▭ Plantago erecta
- Hydrological Resources**
- ▭ Drainage Feature





VEGETATION

BIOLOGICAL RESOURCES

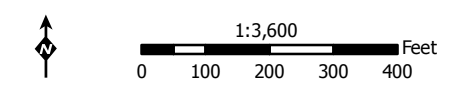
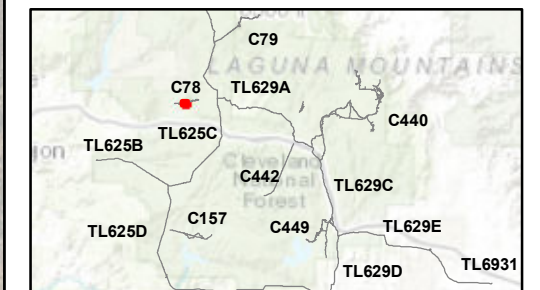
Attachment B: Survey Area Map  
C78 Map 3 of 9

Cleveland National Forest  
Power Line Replacement Projects

CULTURAL RESOURCES

HYDROLOGICAL RESOURCES

- C78
- 2015 Hermes Copper Butterfly Survey Area
- MPR Work Area
- 2016 Biological/Hydrological Survey Area
- Baseline Biological/Hydrological Survey Area
- San Diego Thormmint Survey Area (AECOM; RECON, 2017)
- Cultural Survey Areas by Year**
- 2008
- 2011
- Vegetation**
- Bare Ground
- Diegan Coastal Sage Scrub
- Disturbed (Ruderal/Barren)
- Critical Habitat**
- San Diego Thormmint
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
- Plantago erecta
- Rhamnus crocea
- Rare Plants/Sensitive Butterfly Host Plants (points)**
- Clarkia delicata
- Rhamnus crocea
- USFS Rare Plants**
- San Diego Thormmint
- Hammit's Claycross
- Hydrological Resources**
- Drainage Feature



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**Attachment B: Survey Area Map  
C78 Map 4 of 9**

**Cleveland National Forest  
Power Line Replacement Projects**

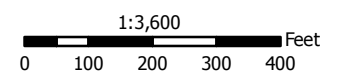
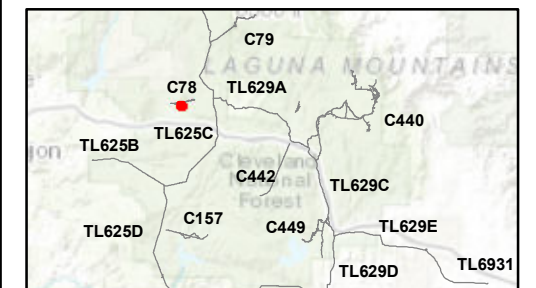
**VEGETATION**

**BIOLOGICAL RESOURCES**

**CULTURAL RESOURCES**

**HYDROLOGICAL RESOURCES**

- C78
- 2015 Hermes Copper Butterfly Survey Area
- MPR Work Area
- 2016 Biological/Hydrological Survey Area
- Baseline Biological/Hydrological Survey Area
- San Diego Thormmint Survey Area (AECOM; RECON, 2017)
- Cultural Survey Areas by Year**
- 2011
- Vegetation**
- Bare Ground
- Diegan Coastal Sage Scrub
- Disturbed (Ruderal/Barren)
- Critical Habitat**
- San Diego Thormmint
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
- Rhamnus crocea
- Rare Plants/Sensitive Butterfly Host Plants (points)**
- ◆ Clarkia delicata
- ◆ Rhamnus crocea
- ▲ San Diego Thormmint Location (AECOM; RECON, 2017)
- USFS Rare Plants**
- San Diego Thormmint
- Hammit's Claycress
- Hydrological Resources**
- Drainage Feature














VEGETATION

BIOLOGICAL RESOURCES

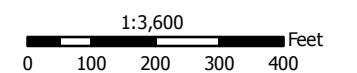
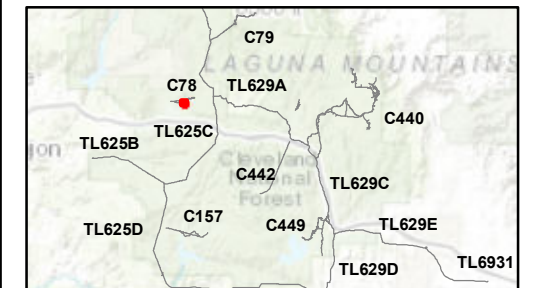
Attachment B: Survey Area Map  
C78 Map 5 of 9

Cleveland National Forest  
Power Line Replacement Projects

-  2015 Hermes Copper Butterfly Survey Area
-  Baseline Biological/Hydrological Survey Area
-  San Diego Thormmint Survey Area (AECOM; RECON, 2017)
- Cultural Survey Areas by Year**
-  2011
- Vegetation**
-  Diegan Coastal Sage Scrub
- Critical Habitat**
-  San Diego Thormmint
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
-  Rhamnus crocea
-  San Diego Thormmint Location (AECOM; RECON, 2017)
- USFS Rare Plants**
-  San Diego Thormmint
-  Felt-leaved Monardella
-  Hammit's Claycress

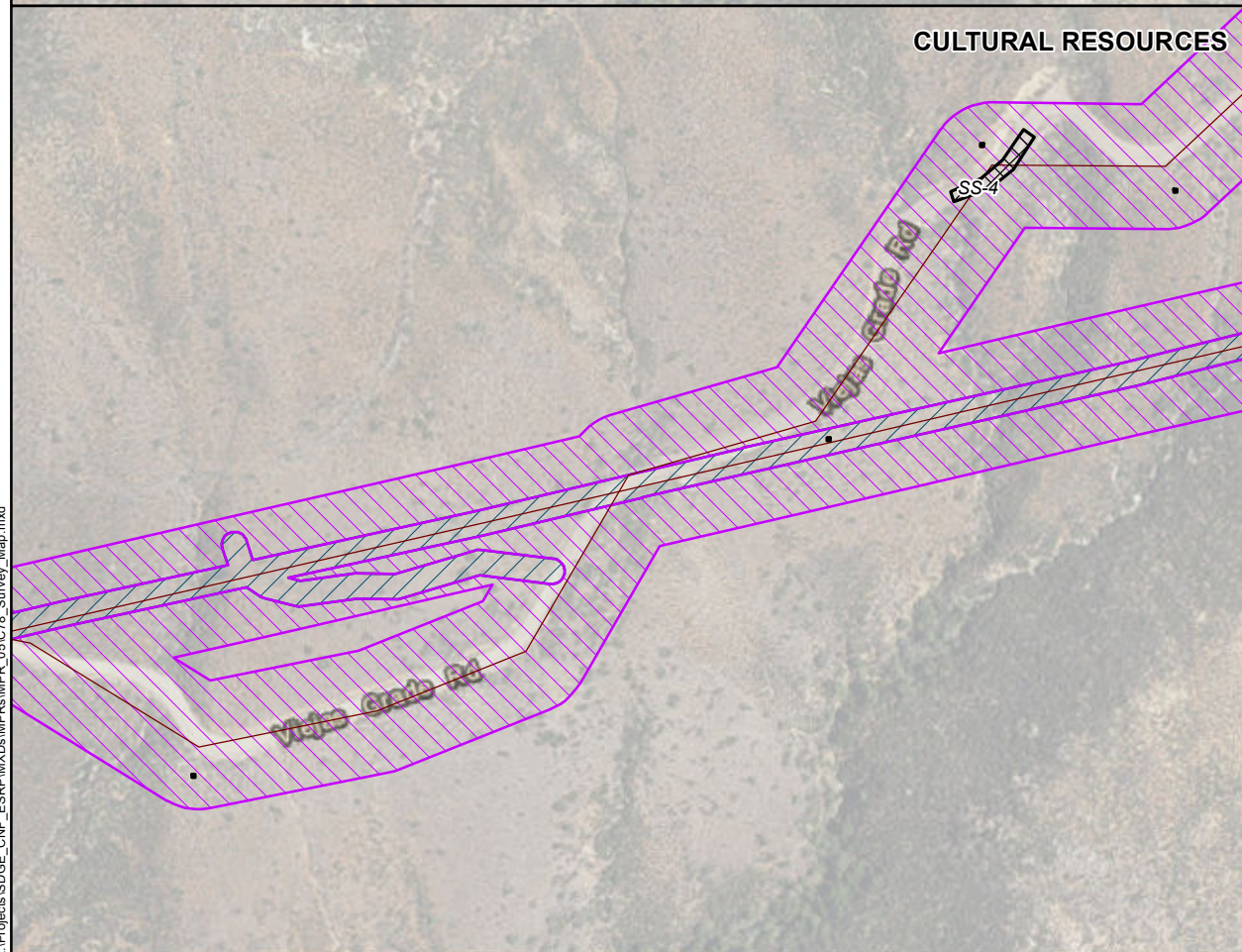
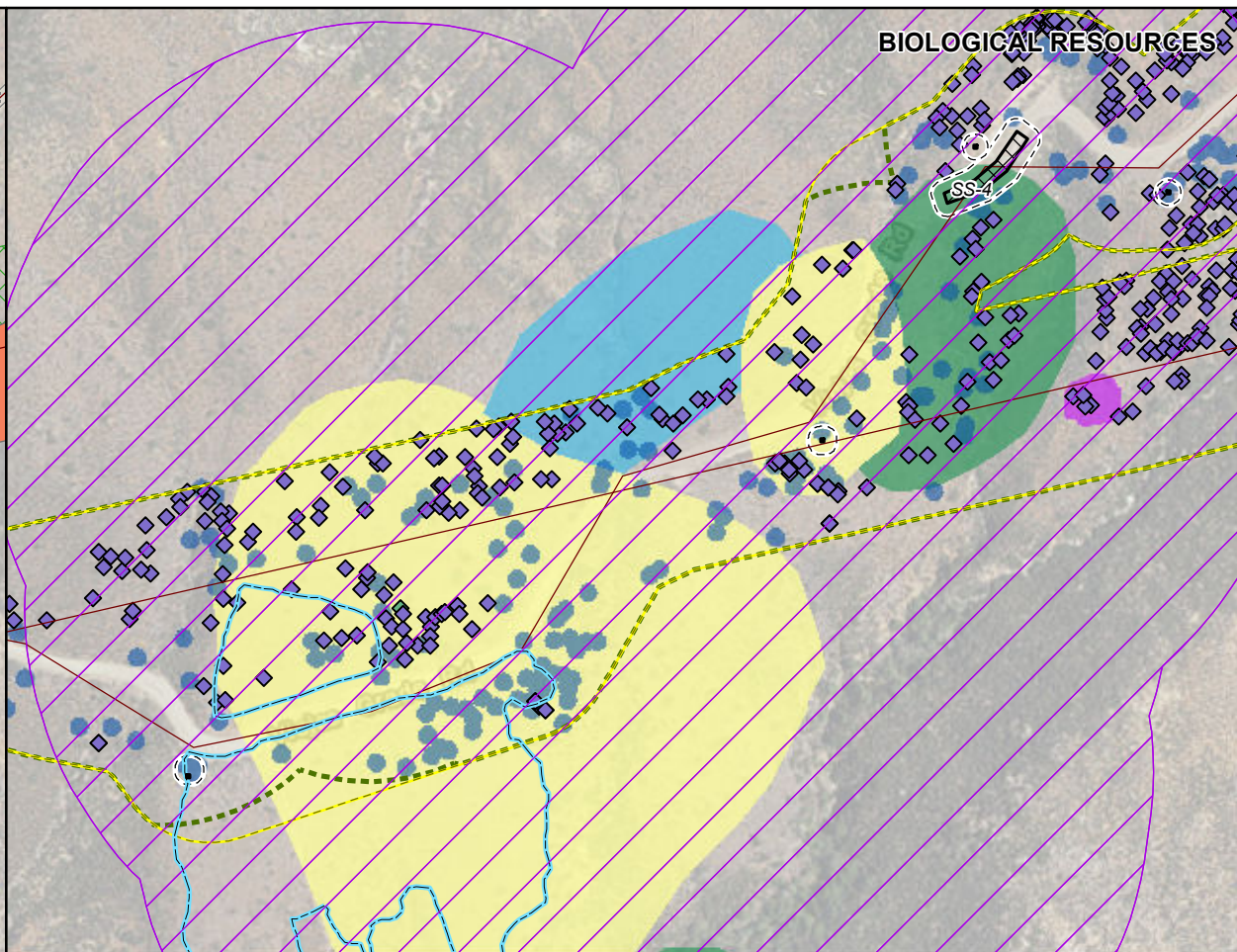
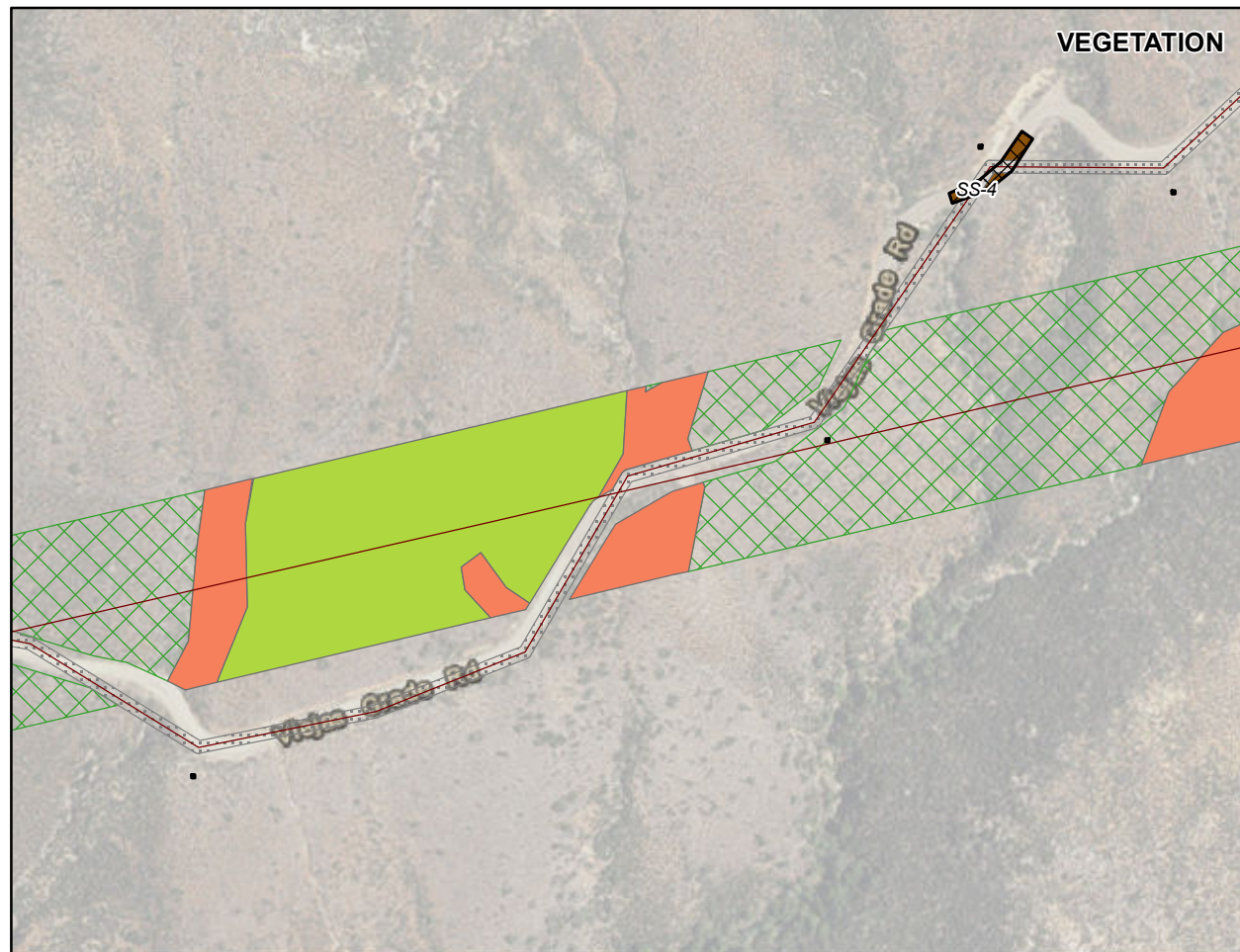
CULTURAL RESOURCES

HYDROLOGICAL RESOURCES

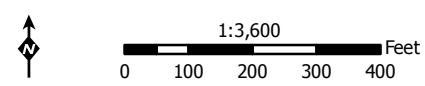
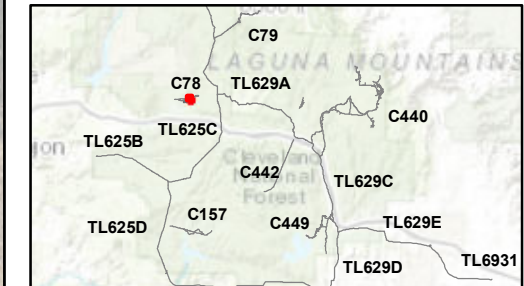


**Attachment B: Survey Area Map  
C78 Map 6 of 9**

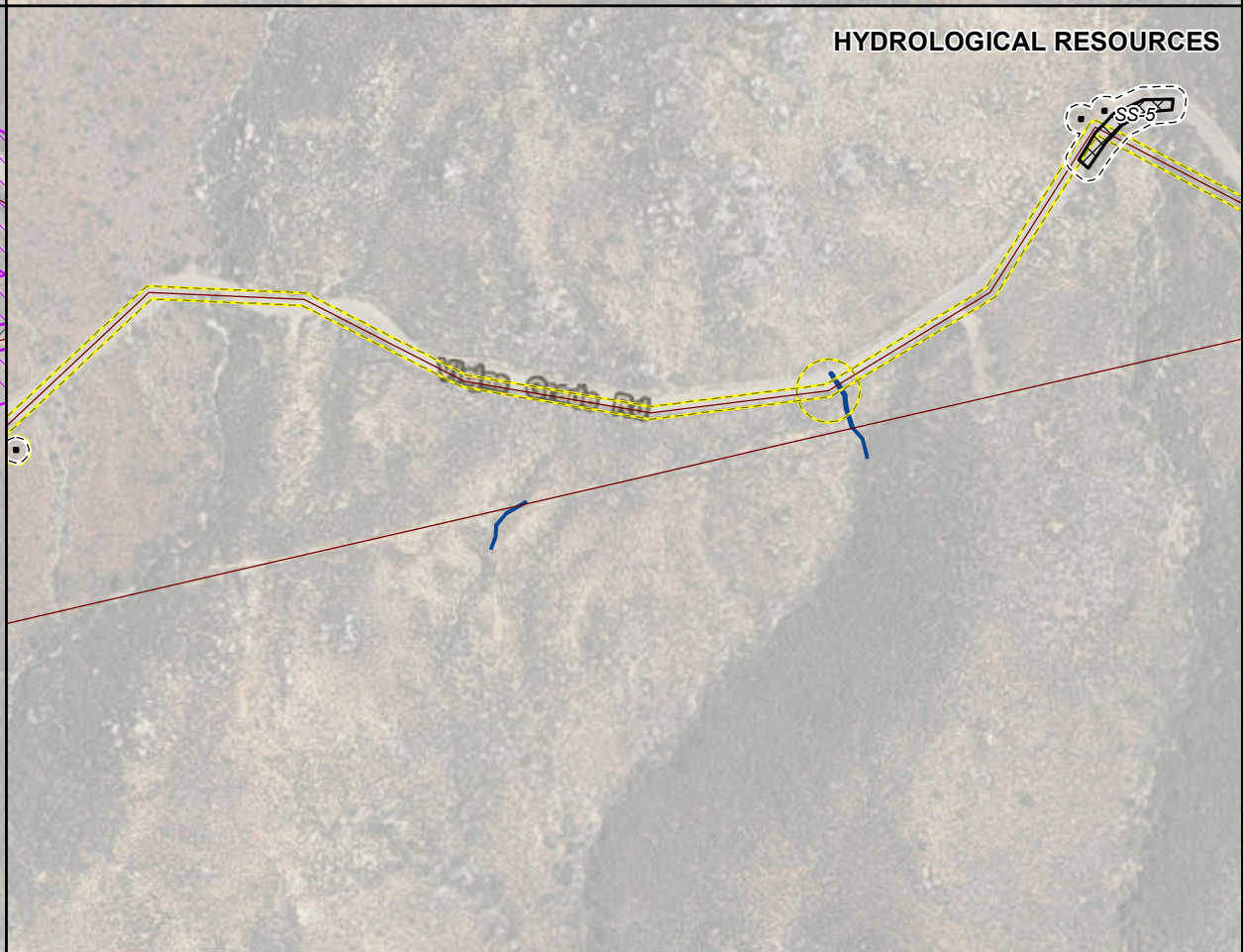
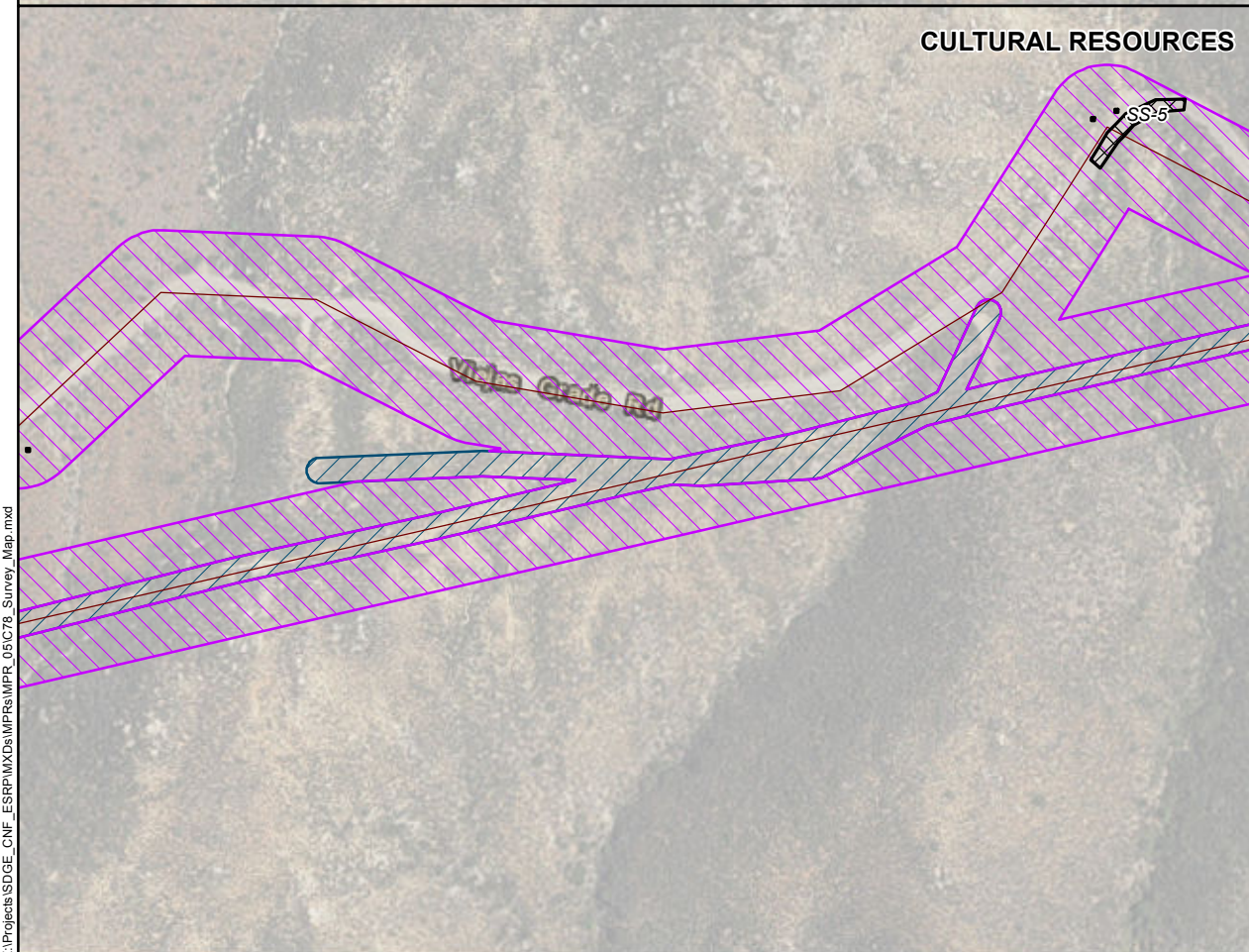
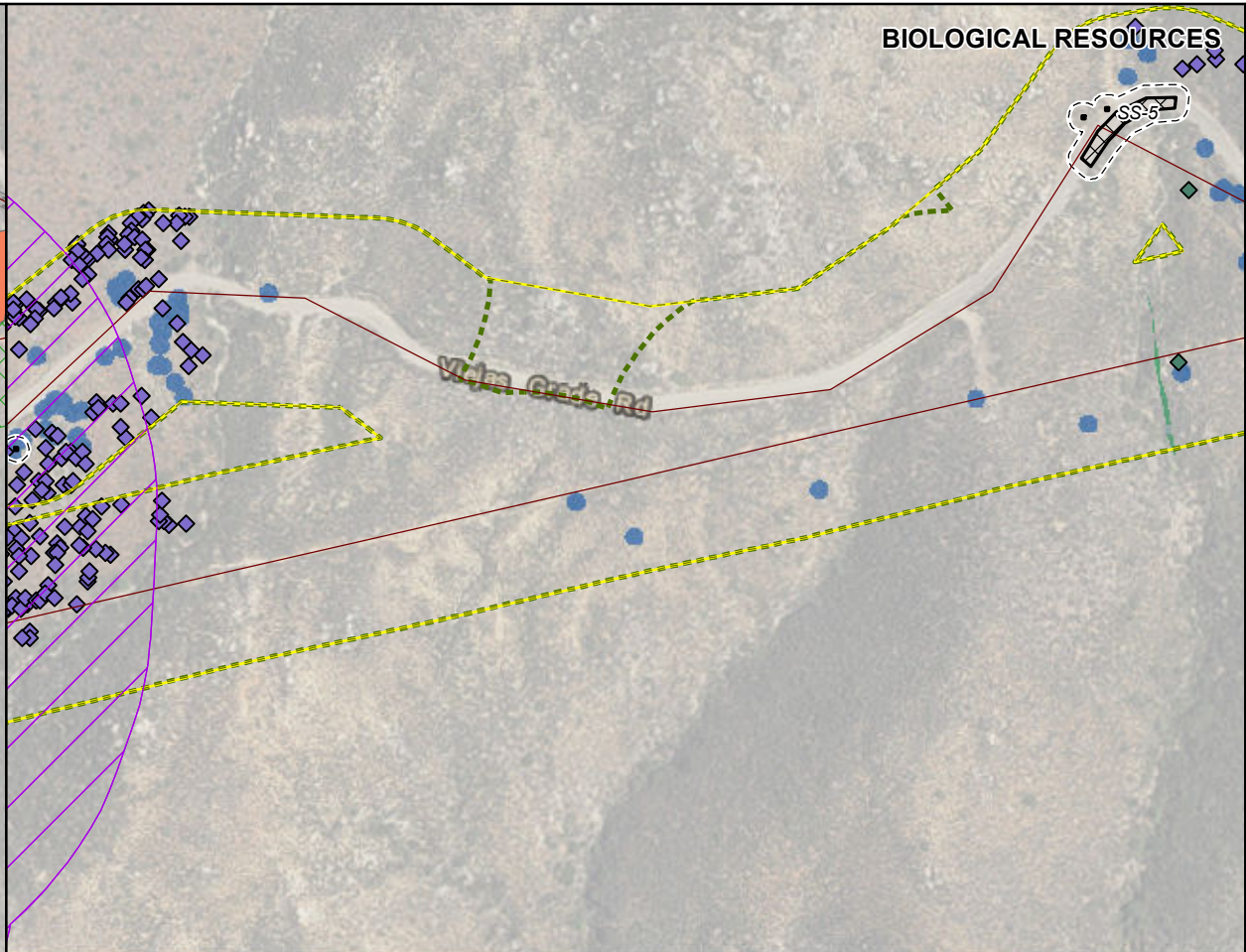
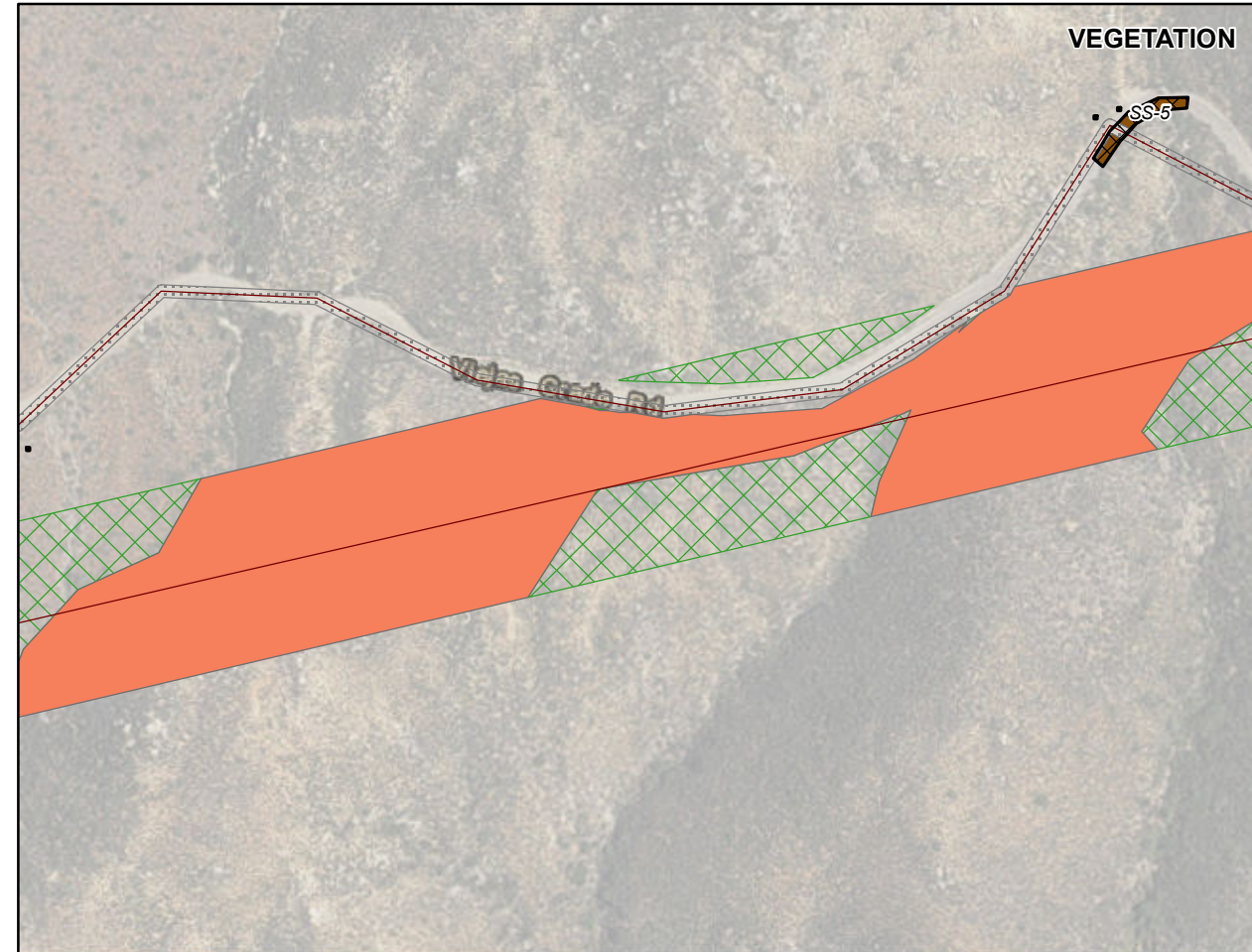
**Cleveland National Forest  
Power Line Replacement Projects**



- C78
- 2015 Hermes Copper Butterfly Survey Area
- ▣ MPR Work Area
- - - 2016 Biological/Hydrological Survey Area
- ▭ Baseline Biological/Hydrological Survey Area
- ▭ San Diego Thormmint Survey Area (AECOM; RECON, 2017)
- Cultural Survey Areas by Year**
- ▨ 2008
- ▨ 2011
- Vegetation**
- Bare Ground
- ▨ Diegan Coastal Sage Scrub
- ▨ Disturbed (Ruderal/Barren)
- Native Grassland
- Southern Mixed Chaparral
- Critical Habitat**
- ▨ San Diego Thormmint
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
- Plantago erecta
- Rhamnus crocea
- Rare Plants/Sensitive Butterfly Host Plants (points)**
- ◆ Acanthomintha ilicifolia
- ◆ Rhamnus crocea
- USFS Rare Plants**
- San Diego Thormmint
- Felt-leaved Monardella
- Hammit's Claycress
- Hydrological Resources**
- Drainage Feature



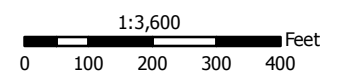
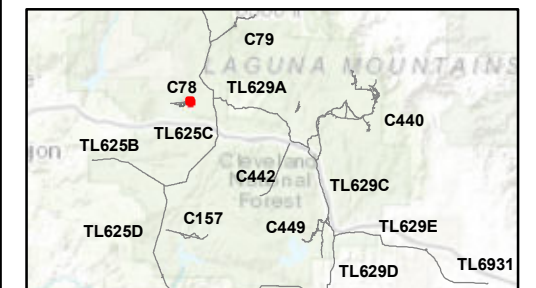
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**Attachment B: Survey Area Map  
C78 Map 7 of 9**

**Cleveland National Forest  
Power Line Replacement Projects**

- C78
- ▨ 2015 Hermes Copper Butterfly Survey Area
- ▨ MPR Work Area
- - - 2016 Biological/Hydrological Survey Area
- ▭ Baseline Biological/Hydrological Survey Area
- Cultural Survey Areas by Year**
- ▨ 2008
- ▨ 2011
- Vegetation**
- Bare Ground
- ▨ Diegan Coastal Sage Scrub
- ▨ Disturbed (Ruderal/Barren)
- Southern Mixed Chaparral
- Critical Habitat**
- ▨ San Diego Thormmint
- Rare Plants/Sensitive Butterfly Host Plants (polygons)**
- Monardella hypoleuca ssp. lanata
- Rhamnus crocea
- Rare Plants/Sensitive Butterfly Host Plants (points)**
- ◆ Monardella hypoleuca ssp. lanata
- ◆ Rhamnus crocea
- USFS Rare Plants**
- Felt-leaved Monardella
- Hydrological Resources**
- Drainage Feature



**Attachment B: Survey Area Map  
C78 Map 8 of 9**

**Cleveland National Forest  
Power Line Replacement Projects**

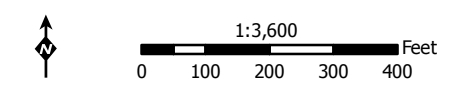
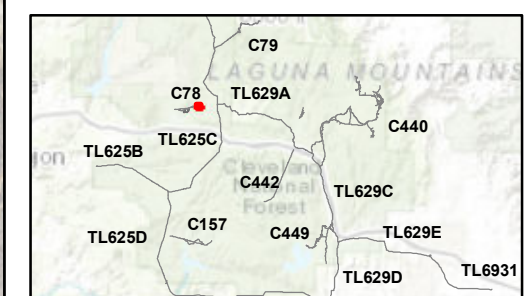
**VEGETATION**

**BIOLOGICAL RESOURCES**

**CULTURAL RESOURCES**

**HYDROLOGICAL RESOURCES**

- C78
- 2015 Hermes Copper Butterfly Survey Area
- MPR Work Area
- 2016 Biological/Hydrological Survey Area
- Baseline Biological/Hydrological Survey Area
- Cultural Survey Areas by Year**
- 2008
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- ◆ Monardella hypoleuca ssp. lanata
- ◆ Rhamnus crocea
- USFS Rare Plants**
- Felt-leaved Monardella






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VEGETATION

BIOLOGICAL RESOURCES

Attachment B: Survey Area Map  
C78 Map 9 of 9


Cleveland National Forest  
Power Line Replacement Projects

-  MPR Work Area
-  2016 Biological/Hydrological Survey Area
-  Baseline Biological/Hydrological Survey Area


Cultural Survey Areas by Year

-  2011
-  2017

Vegetation

-  Bare Ground

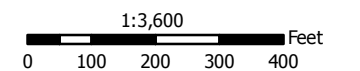
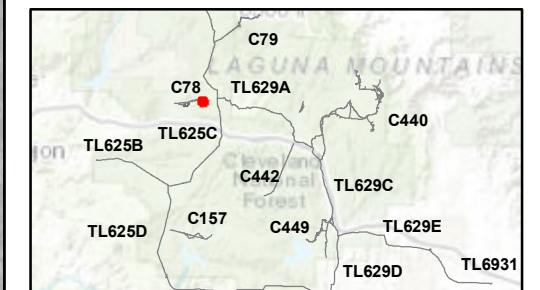
USFS Rare Plants

-  Felt-leaved Monardella

CULTURAL RESOURCES

HYDROLOGICAL RESOURCES

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**ATTACHMENT C: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM**



## MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

### RESOURCE EVALUATION

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

EIR/EIS Section	Summary of Potential Impacts
Visual Resources	<p><i>No Change.</i> The Final EIR/EIS found that impacts to visual resources will be less than significant (Class III). The refinements associated with this Minor Project Refinement (MPR) request (as defined on page 2 of the MPR Request Form) will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact.</p> <p>According to the Final EIR/EIS, there are no scenic vistas or state scenic highways along Circuit (C) 78. Because the refinements occur adjacent or are in close proximity to the alignment, impacts to scenic vistas and highways will be consistent with what was described in the Final EIR/EIS and will remain less than significant (Class III).</p> <p>As discussed in the Impact VIS-3 analysis of the Final EIR/EIS, “the establishment of temporary work areas and stringing sites may create impacts as a result of necessary vegetation removal and site preparation activities.” The refinements associated with the stringing sites, C78 Fly Yard, staging area, and temporary workspaces for the pole replacement and installation could potentially result in up to approximately 0.88 acre of vegetation clearing and/or minor grading depending on the site conditions. The C78 Fly Yard and staging area occur within previously disturbed areas. All areas will be restored to near pre-construction conditions in accordance with Applicant-Proposed Measure (APM) VIS-01. As these refinements are consistent with the analysis of the Final EIR/EIS and with implementation of APM VIS-01, construction impacts to the existing visual character and quality of the site and surroundings will continue to be less than significant under the California Environmental Quality Act (CEQA).</p> <p>The addition of existing navigation roads will not require vegetation clearing or ground disturbance. Therefore, the navigation roads will be consistent with the analysis described in Impact VIS-3 of the Final EIR/EIS and will not result in a new significant impact.</p> <p>The remaining Project refinements—the addition of permanent guy anchors, the replacement of existing poles, the addition of three new steel poles, and reconfiguration of three approved stringing sites and addition of five stringing sites—will not affect additional sensitive viewers because the refinements occur adjacent or are in close proximity to the alignment and approved Project components.</p> <p>In conclusion, the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to visual resources.</p>
Air Quality	<p><i>No Change.</i> 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</p>

	<p>equipment, as well as from off-site trucks hauling construction materials.” In addition, the Final EIR/EIS states that impacts associated with volatile organic compounds, nitrogen oxides, carbon monoxide, and fine particulate matter emissions are considered significant and unavoidable under CEQA (Class I). Activities associated with construction and utilization of the refinement areas are consistent with those discussed in the Final EIR/EIS. Use of the refinement areas is integrated with the construction activities occurring along the approved alignment; accordingly, the refinements will not increase the number of trips needed to construct C78. As a result, the refinements are not anticipated to increase air emissions beyond what was analyzed in the Final EIR/EIS.</p> <p>Based on the specific site conditions, minor grading and vegetation removal may be required for the stringing sites, C78 Fly Yard, staging area, and temporary workspaces associated with the pole replacement and installation. Though the Project may require up to approximately 0.88 acre of additional minor grading and vegetation removal, these activities will be short term and temporary in nature. In addition, APM AIR-01 through APM AIR-05 (which include minimizing idling time, controlling fugitive dust, limiting traffic speeds on unpaved roads, requiring the use of low-emission equipment, and requiring the use of best management practices [BMPs] for dust and erosion) will be implemented throughout the refinement areas. Therefore, fugitive dust from the refinement areas will not result in a new significant impact or a substantial increase beyond what was analyzed in the Final EIR/EIS.</p> <p>As discussed in the Final EIR/EIS, there are sensitive receptors adjacent to C78 and within 1,000 feet of C78. The Final EIR/EIS determined that, “since construction activities at any given location will be short-term and will move along the various alignments linearly, construction activities will not expose sensitive receptors to substantial pollutant concentrations as construction activities and emissions will not occur in any one place for an extended period of time.” The refinement areas are located along the alignment or adjacent to it, and are consistent with the analysis in the Final EIR/EIS. The closest sensitive receptors to the staging area and C78 Fly Yard are each located more than 400 feet away; accordingly, these refinements may result in a minor increase in air quality impacts in the localized areas near these receptors. However, helicopter use at the C78 Fly Yard will occur briefly throughout the day (the typical hovering time is estimated to be between two and five minutes in the Final EIR/EIS), and approximately 11 round-trip flights will occur on the average day. Due to temporary and intermittent helicopter use, short-term usage of the refinements, and implementation of APM AIR-01 through APM AIR-05, impacts to sensitive receptors will continue to be less than significant under CEQA (Class III).</p> <p>In conclusion, the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to air quality, which was determined to be significant and unmitigable (Class I) in the Final EIR/EIS.</p>
Biological Resources	<p><i>No Change.</i> The Final EIR/EIS found that impacts to biological resources will be less than significant with mitigation (Class II). The approved C78 alignment (including some of the refinement areas) was surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial surveys that were conducted for the Project, and the alignment was also assessed for impacts in the Final EIR/EIS. In 2015, a habitat assessment and focused surveys were conducted for Hermes copper butterfly (<i>Lycaena hermes</i>). In 2016, a habitat assessment and partial focused surveys were conducted for Quino checkerspot butterfly (<i>Euphydryas editha quino</i>), and a bat roost assessment and focused surveys were conducted for Townsend’s big-eared bat (<i>Corynorhinus townsendii</i>) and other potential bat roosts. Focused rare plant and Hermes copper butterfly surveys were not conducted for C78 at the request of the United States (U.S.) Forest Service (USFS) with California Public Utilities Commission (CPUC) concurrence. In March 2017, as part of the Sunrise Powerlink Habitat Restoration Program, surveys were conducted for San Diego thornmint (<i>Acanthomintha ilicifolia</i>) in areas that overlapped with some portions of the Project; however, this survey effort did not</p>

cover the entire Project alignment. Finally, all requested refinement areas have been surveyed and incorporated into the Pre-activity Study Report (PSR) process in accordance with SDG&E's Subregional Natural Community Conservation Plan (NCCP). Results for these biological surveys are depicted in Attachment B: Survey Area Map.

The requested refinements will result in increases in temporary impacts and permanent impacts by up to approximately 0.88 acre and less than approximately 0.01 acre, respectively. This includes temporary and permanent impacts to approximately 0.02 acre of southern mixed chaparral and approximately 0.04 acre of Diegan coastal sage scrub vegetation communities. Attachment B: Survey Area Map depicts the locations of the requested refinement areas and biological survey results. All areas temporarily impacted will be restored following construction in accordance with Mitigation Measure (MM) BIO-4 and the Project's Habitat Restoration Plan. In addition, SDG&E will provide habitat compensation or restoration for permanent impacts to native vegetation communities in accordance with the requirements of the Project's Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). Thus, the minor increases in permanent and temporary impacts will continue to be less than significant with mitigation under CEQA (Class II).

As shown in Attachment B: Survey Area Map, the refinements will potentially impact felt-leaved monardella (*Monardella hypoleuca* spp. *lanata*), as well as host plants for Hermes copper butterfly and Quino checkerspot butterfly, including spiny redberry (*Rhamnus crocea*) and dot-seed plantain (*Plantago erecta*), that are located within or adjacent to the requested refinement areas. Focused protocol-level surveys for Quino checkerspot butterfly and Hermes copper butterfly were conducted in 2010. A habitat assessment and focused surveys were conducted for Hermes copper butterfly in 2015. Partial focused surveys for Quino checkerspot butterfly were conducted in 2016, but discontinued at the request of the USFS. No Hermes copper butterflies or Quino checkerspot butterflies were observed during the 2010, 2015, or 2016 surveys. No U.S. Fish and Wildlife Service- (USFWS-) designated critical or occupied Quino checkerspot butterfly habitat occurs within the refinement areas. Any potential impacts to suitable unoccupied habitat will be mitigated in accordance with the SDG&E Low-Effect Habitat Conservation Plan for Quino Checkerspot Butterfly. Impacts to all special-status butterfly host plants will be avoided to the maximum extent possible by installing fencing or flagging to marked areas for avoidance within or adjacent to the construction areas.

USFWS-designated critical habitat for San Diego thornmint, a federally threatened plant species, exists along C78. The refinements will result in less than approximately 0.01 acre of permanent and temporary impacts to critical habitat for this species. A rare plant survey was conducted in 2010, and 100 San Diego thornmint individuals were observed along C78. The locations of these individuals do not fall within any of the requested refinement areas. In 2016, the USFS provided data to SDG&E for two locations where San Diego thornmint occurs on C78, and the USFS requested—and the CPUC concurred—to not conduct surveys for San Diego thornmint on C78. In 2017, AECOM and RECON biologists (on behalf of SDG&E) surveyed for San Diego thornmint in some areas on C78 as part of the Sunrise Powerlink Habitat Restoration Program. The biologists identified six San Diego thornmint plants in an area that overlaps with the areas mapped by the USFS for the species. The locations of these individuals do not fall within any of the requested refinement areas. If San Diego thornmint is observed near the refinements, impacts to the species will be avoided to the maximum extent possible by installing fencing or flagging to marked areas for avoidance in the construction areas. Where impacts are unavoidable, impacts will be quantified and compensated in accordance with MM BIO-15, the Project's Special-Status Plant Species Salvage and Relocation Plan, and the USFWS Final Biological Opinion for the Project.

	<p>With the implementation of the Subregional NCCP's operational protocols and the MMCRP, there will be no significant change in impacts addressed in the Project's Final EIR/EIS. In conclusion, the requested refinements will not result in a new significant impact or result in a substantial increase in the severity of a previously identified impact to biological resources.</p>
<p>Cultural and Paleontological Resources</p>	<p><i>No Change.</i> The Final EIR/EIS found that impacts to archaeological resources will be less than significant with mitigation (Class II). C78 was previously surveyed for cultural resources during pre-construction and cultural resources inventory work, as described in the <i>Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project in support of the Proponent's Environmental Assessment (ASM 2011)</i>. In accordance with the MMCRP, supplemental intensive pedestrian surveys and an updated records search were conducted by ASM Affiliates, Inc. (ASM) in 2015 and 2017 for refinement areas that were identified along C78 as being outside of the previous cultural survey coverage to assess the presence or absence of any unknown cultural resources within the footprint of these refinement areas. Prior to conducting the supplemental surveys, an intensive review and analyses were conducted to cross-check baseline data with the additional Project refinements. In summary, no new cultural resources were recorded during the supplemental surveys, and the results of the analyses are summarized below. A confidential cultural resources map and geographic information system files with the results from these surveys will be submitted to the USFS in support of this MPR request.</p> <p>As part of the approved Project, one stringing site was previously located within the boundary of P-37-009143 (characterized as an historic stagecoach route). During the analyses of the final engineering for C78, this stringing site was adjusted further southeast along the road. In addition, a second stringing site was added along the road. Both stringing sites fall within the historic-era stagecoach road, the recorded boundary of P-37-009143. P-37-009143 was analyzed as part of the Final EIR/EIS and, according to ASM 2011, the 1979 site form for P-37-009143 recommended that the road be considered eligible for listing in the National Register of Historic Places as a contributing element to an historic district. Subsequent review of the condition of the historic-era road revealed that the road has been continually maintained over time, and is well travelled. The integrity of the route was formally re-evaluated by ASM in 2005, and documented as having been completely destroyed by grading and covered with gravel, with no remnants of the original state route observed. In 2011, ASM again revisited the site and confirmed that it no longer retained original integrity (ASM 2011). As a result, no constraints or additional considerations were recommended for the stringing site additions/modifications and pole replacement activities proposed and approved within the resource boundary. The two revised stringing sites fall within the area previously analyzed for the Project and no additional considerations or constraints are recommended for the requested refinements.</p> <p>No other refinement areas are within the boundaries of recorded resources or within 50 feet, and no additional constraints or considerations are recommended for the requested refinements. As part of an update to Appendix A that was completed and added to the Historic Properties Management Plan (HPMP) in August 2016, C78 baseline constraints and revisions were distributed by the USFS to the consulting parties. Four stringing sites were identified in the Appendix A update, including the one previously approved within the boundaries of P-37-009143. An update to Appendix A of the HPMP will be provided to the USFS noting additional components requested in this MPR that were not previously identified in the 2011 Tables or 2016 Appendix A update.</p> <p>The requested refinements will not impact or adversely affect any resources that are eligible for or listed in the National Register of Historic Places. Therefore, the requested refinements will not result in a change in the significance of a historical or archaeological resource nor result in an effect to a historic property. To date, there are no Traditional Cultural Places documented within the requested refinement areas and the refinements will not cause an adverse change to Traditional Cultural Places. In addition, all of the</p>

	<p>refinements are located within the Project’s area of potential effect (APE) as defined in the Project’s Programmatic Agreement. Thus, the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to archaeological resources.</p> <p>The Final EIR/EIS found that impacts to paleontological resources will be less than significant (Class III). Although the proposed refinements will potentially increase the ground disturbance acreage by up to approximately 0.88 acre, the proposed refinements are located within the same geological formations along C78 as analyzed in the Final EIR/EIS. There are a number of refinements underlain by sedimentary rock units with a Potential Fossil Yield Classification (PFYC) Class 3b ranking, including Poles P172711 and P257766, which are direct-bury poles. In accordance with APM CUL-08, a paleontological monitor will be present for excavation activities associated with new steel poles that are underlain by PFYC Class 3b deposits. In addition, the Paleontological Monitoring &amp; Treatment Plan will be updated to include any additional poles that require monitoring, and APM CUL-01 (which requires paleontological training for all personnel) will be implemented. The disturbance from minor vegetation clearing and grading associated with the other refinements will not be deep enough to affect any paleontological resources.</p> <p>In summation, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified potential impact to paleontological resources.</p>
Greenhouse Gas (GHG) Emissions	<p><i>No Change.</i> The Final EIR/EIS found impacts associated with GHG emissions will be less than significant (Class III). The requested refinements will not change the amount of heavy equipment utilized or the number of trips needed to complete construction as contemplated in the Final EIR/EIS. The minor grading and vegetation clearing that may be associated with some of the requested refinements 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 (CAP) criteria for annual grading and land clearing. The CAP criteria include grading and clearing no more than 1,285 acres of land per year with no soil hauling and no other aspect of construction or site preparation, and grading and clearing no more than 100 acres of land per year, assuming up to 3,100 cubic yards per day of soil hauling. Therefore, the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to GHG emissions.</p>
Public Health and Safety	<p><i>No Change.</i> The Final EIR/EIS found that impacts associated with public health and safety will be less than significant with mitigation (Class II). There are no known hazardous materials sites located in the refinement areas according to the Final EIR/EIS and the <i>Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California</i>. In accordance with MM PHS-1 and MM PHS-2, construction personnel will receive the Worker Environmental Awareness Program (WEAP) training, which will include appropriate work practices and hazardous materials protocol, and BMPs will be implemented in accordance with the Spill Response and Notification Plan to prevent impacts from the release of hazardous materials.</p> <p>The C78 Fly Yard is located more than five miles from the privately owned On the Rocks Airport. With implementation of MM PHS-5 (which requires coordination with local air traffic control and compliance with all Federal Aviation Administration regulations to prevent conflicts with air traffic generated by local airstrips) and the Project’s Helicopter Lift Plan, adverse and significant impacts to air traffic patterns and air safety due to the use of helicopters will continue to be less than significant with mitigation under CEQA (Class II).</p>

	In conclusion, the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to public health and safety.
Fire and Fuels Management	<i>No Change.</i> The Final EIR/EIS found that impacts associated with fire and fuels management will be less than significant with mitigation (Class II). The refinement areas will be located within High and Very High Fire Hazard Severity Zones, which were analyzed in the Final EIR/EIS. Activities associated with construction and utilization of the refinement areas are consistent with those discussed in the Final EIR/EIS. The potential risk of wildfire ignition and spread associated with the refinements will be managed in compliance with the Project's Construction Fire Prevention/Protection Plan. Therefore, the refinements will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to fire and fuels management.
Hydrology and Water Quality	<p><i>No Change.</i> The Final EIR/EIS found that impacts associated with hydrology and water quality will be less than significant with mitigation (Class II). Activities associated with construction and utilization of the refinement areas are consistent with those discussed in the Final EIR/EIS. The refinement areas will potentially increase the amount of ground disturbance from minor grading and vegetation clearing by up to approximately 0.88 acre, depending on site conditions. However, with the implementation of mitigation as defined in the Final EIR/EIS (e.g., the development of an Erosion Control Plan and Storm Water Pollution Prevention Plan in accordance with MM HYD-1), off-site sedimentation due to storm water and non-storm water sources will be minimized and will not significantly increase impacts to surface water. The amount of water that may be required for dust control and fire suppression for the refinement areas will result in a negligible increase to the total amount of water required, and will not increase impacts to the groundwater supply in the Project area beyond what was analyzed in the Final EIR/EIS.</p> <p>Hydrology surveys for the Project focused on the presence of potentially jurisdictional wetlands or waters of the U.S. and were conducted in support of the Final EIR/EIS over multiple years. A Preliminary Jurisdictional Delineation Report for the Project was completed in August 2015. Supplemental water resource surveys of the refinement areas were conducted during the PSR process in 2016. The requested refinement areas do not contain any waters of the state or the U.S. under the jurisdiction of the California Department of Fish and Wildlife, Regional Water Quality Control Board, or U.S. Army Corps of Engineers. Drainages along the alignment were mapped by Chambers Group, Inc., as shown in Attachment B: Survey Area Map. On page 3 of Attachment B: Survey Area Map, a drainage appears to cross Stringing Site-3 (described in Attachment A: Refinement Table and Impacts Table). However, an existing culvert crosses under the road and the requested stringing site will only occur within the road limits; therefore, no impacts to this drainage will occur. In addition, no impacts to the other mapped drainages will occur as a result of the other refinement areas, and no additional jurisdictional water permitting will be required.</p> <p>In conclusion, the requested refinements 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.</p>
Land Use and Planning	<i>No Change.</i> The Final EIR/EIS found that impacts associated with land use and planning will be less than significant with mitigation (Class II). In accordance with the Construction Notification Plan and MM LU-1, property owners within 1,000 feet of C78 will be notified of construction activities, and the property owners within 1,000 feet of the requested refinements will be included in that notification process. Thus, temporary use conflicts and other disturbances of land uses at or near the refinement areas will be less than significant with implementation of MM LU-1.



	<p>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. The requested refinements will be located in County of San Diego land use and zoning designations, as well as Cleveland National Forest Land Management Plan land use zones that were analyzed in the Final EIR/EIS. In addition, the requested refinements will not conflict with applicable land use plans, policies, or the regulations of an agency with jurisdiction over the Project, as their uses were already contemplated 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 identified significant impact to land use and planning.</p>
Noise	<p><i>No Change.</i> The Final EIR/EIS found that impacts associated with noise will be less than significant with mitigation (Class II). Additional construction-related noise will be generated within the refinement areas due to pole installation and replacement, vegetation removal, helicopter use, minor grading, stringing conductor, equipment staging, and large equipment operation. However, noise impacts from construction activities associated with the refinement areas will be the same as those analyzed in the Final EIR/EIS, including impacts from intermittent and temporary helicopter activities. Additionally, there will be no change in the types of heavy equipment discussed in the Final EIR/EIS as a result of these refinements.</p> <p>As discussed in the Final EIR/EIS, the property lines of the nearest sensitive receptors are located directly adjacent to the proposed alignment. The majority of the refinements areas are adjacent to the alignment, and are not located substantially closer to any sensitive receptors than the original alignment that was analyzed in the Final EIR/EIS. However, some activities will occur closer to sensitive receptors when compared to the original alignment, and these activities include tap pole replacement and anchor work; use of the C78 Fly Yard and staging area; and pole installation and stringing activities associated with Poles P172711, P257766, and P172713. The requested refinements will result in temporary increases in noise levels, but the work will be short term at any given location. In addition, implementation of MM NOI-1, APM NOI-02, and APM NOI-03 will reduce noise impacts by utilizing temporary noise barriers, positioning equipment away from the residences to the extent possible, and ensuring equipment is maintained in accordance with manufacturer’s recommendations.</p> <p>The staging area and C78 Fly Yard are both located more than 400 feet from the closest sensitive receptors. The distance of these refinement areas to the nearest sensitive receptors is similar to what was analyzed in the Final EIR/EIS for other staging and fly yards included in the Project. Helicopter use will only occur at the C78 Fly Yard for short periods of time throughout the day. In addition, the typical hovering time is estimated to be between two and five minutes, and approximately 11 round-trip flights will occur on the average day. Further, as described in the Final EIR/EIS, MM NOI-2, APM NOI-06, and APM NOI-09 will be implemented to minimize disturbance to sensitive receptors. The implementation of these APMs and MMs will ensure that noise generated by helicopters will be short-term and consistent with the Final EIR/EIS and remain less than significant with mitigation under CEQA (Class II).</p> <p>In conclusion, the requested refinements will not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact to noise.</p>
Public Services and Utilities	<p><i>No Change.</i> The Final EIR/EIS found that impacts associated with public services and utilities will be less than significant with mitigation (Class II). The requested refinement areas will not increase or add new impacts to public services and utilities, such as fire protection, municipal water supplies, telecommunications infrastructure, or landfills. With the implementation of the Construction Fire Prevention/Protection Plan and APM HAZ-01 through APM HAZ-06 (which include construction restrictions during Red Flag</p>

	<p>Warnings, WEAP training, removal of dead and decaying vegetation, and fire tool requirements), any fire hazards resulting from the refinement areas will be mitigated, and demand for increased fire protection services will be avoided. Construction water needs will not be increased beyond what was contemplated in the Final EIR/EIS, and no new or expanded municipal water facilities or services will be required. AT&amp;T facilities are located on Poles P107769, P970336, and P172691, and will be transferred to the new poles in accordance with MM PSU-1; thus, impacts to telecommunications services will continue to be less than significant with mitigation under CEQA (Class II). Additional waste, besides what was already contemplated for the Project in the Final EIR/EIS, will not be generated due to the use of the requested refinements; thus, the refinements will not result in the need for the expansion of a landfill or other disposal site. As a result, the requested refinement areas are consistent with the Final EIR/EIS analysis. Therefore, the requested refinements 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.</p>
Recreation	<p><i>No Change.</i> The Final EIR/EIS found that impacts associated with recreation will be less than significant with mitigation (Class II). The refinement areas will be located adjacent to or within close proximity to the approved C78 alignment. Ma Tar Awa RV Camper Park is the only recreational area near C78, as identified by the Final EIR/EIS. Indirect access north of the park is available near the western portion of the alignment via Viejas Grade Road and Browns Road. Use of the refinement areas may temporarily restrict access on Viejas Grade Road; however, it will not increase the impacts on access beyond what was analyzed in the Final EIR/EIS, and more direct access is available south of the park via Interstate 8 and Willows Road. Therefore, use of the refinement areas will not substantially reduce or preclude access or visitation to the park or increase the possibility of unauthorized access to specially designated or restricted areas, consistent with the Final EIR/EIS. Additionally, implementation of a Traffic Control Plan (APM TRANS-04) and additional traffic control considerations, as described in the Transportation and Traffic section of the Final EIR/EIS, will minimize the potential for adverse and significant impacts to motorists; therefore, any impacts associated with impaired access to the park will be less than significant with mitigation under CEQA (Class II). Thus, the requested refinement areas are 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.</p>
Transportation and Traffic	<p><i>No Change.</i> The Final EIR/EIS found that impacts associated with transportation and traffic will be less than significant (Class III). The refinement areas will not require additional or different types of construction vehicles and equipment than discussed in the Final EIR/EIS for construction of the approved Project. In addition, the total number of truck trips associated with construction of the Project will not change because the location of the refinement areas will be adjacent to or within close proximity to the approved C78 alignment. Therefore, the refinement areas will affect the same main roadways that were analyzed in the Final EIR/EIS, such as Viejas Grade Road, Via Arturo Road, and Red Oak Road. In addition, several smaller public roads near the stringing site on the western portion of the alignment will be used. Because the use of the refinement areas will be integrated into the uses and activities already proposed to occur along C78 and because the number of trips will not increase, the existing levels of service (LOS)—which are between A and C for Viejas Grade Road and do not exist for the smaller public roads—will not be adversely impacted. Additionally, implementation of a Traffic Control Plan (APM TRANS-04) will adequately address any potential temporary impacts to the LOS on these roads.</p> <p>The daily amount of traffic in the vicinity of the new staging area and C78 Fly Yard is generally light; the staging area is located off of a private dirt road, and the C78 Fly Yard is located off of Via Arturo Road, which is a small public road leading to a couple of</p>

	<p>residences. As a result, no adverse impacts on traffic flow are anticipated due to the use of the staging area and fly yard, which is consistent with the determination provided in the Final EIR/EIS.</p>
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In conclusion, the requested refinements 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 D: COMPARISON MAP**





**Attachment D:  
Comparison Map  
C78 Map 1 of 16**

**Cleveland National Forest  
Power Line Replacement Projects**







**2015 Preliminary Design**

-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  New Anchor
-  Stringing Site
-  Wood-to-Steel Replacement
-  Construction Only Access
-  Navigation Access Road








-  United States Forest Service
-  Bureau of Indian Affairs Land

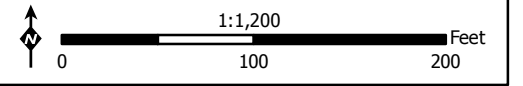


**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Wood-to-Steel Replacement
-  New Anchor
-  Wood-to-Steel Replacement
-  Construction Only Access
-  Navigation Access

**MPR #5**

-  New Steel Pole
-  Replace Tap Pole
-  New Anchor
-  Navigation Access Road
-  Stringing Site
-  United States Forest Service
-  Bureau of Indian Affairs Land



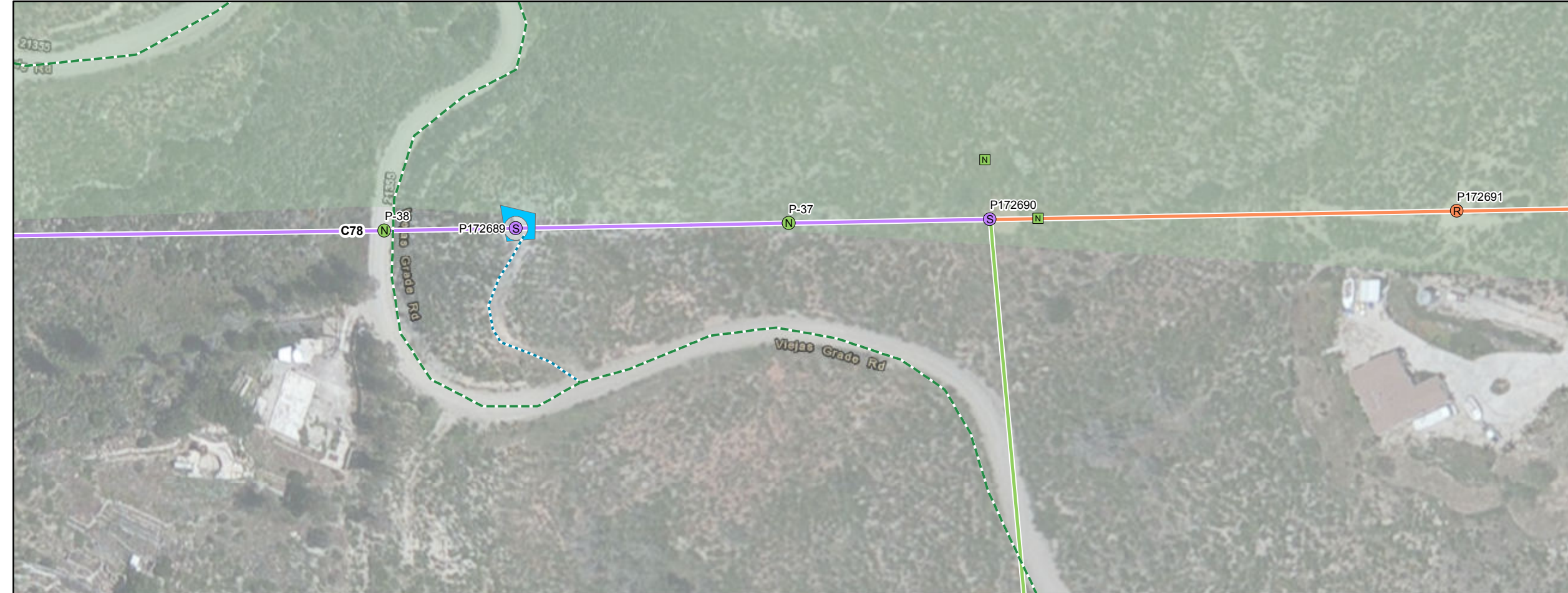
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**Attachment D:  
Comparison Map  
C78 Map 2 of 16**

**Cleveland National Forest  
Power Line Replacement Projects**

**2015 Preliminary Design**

- Ⓢ Wood-to-Steel Replacement Pole
- Ⓝ New Steel Pole
- Ⓡ Removal Pole
- Ⓜ New Anchor
- Stringing Site
- New Steel
- Removal
- Wood-to-Steel Replacement
- - - Construction Only Access
- - - Navigation Access Road



**Final Design (Not Required for MPR)**

- Ⓢ Wood-to-Steel Replacement
- Ⓜ New Anchor
- Removal
- Wood-to-Steel Replacement
- - - Construction Only Access
- - - Navigation Access

**MPR #5**

- Ⓣ Replace Tap Pole
- Ⓜ New Anchor
- Stringing Site
- United States Forest Service



1:1,200
Feet


0
100
200

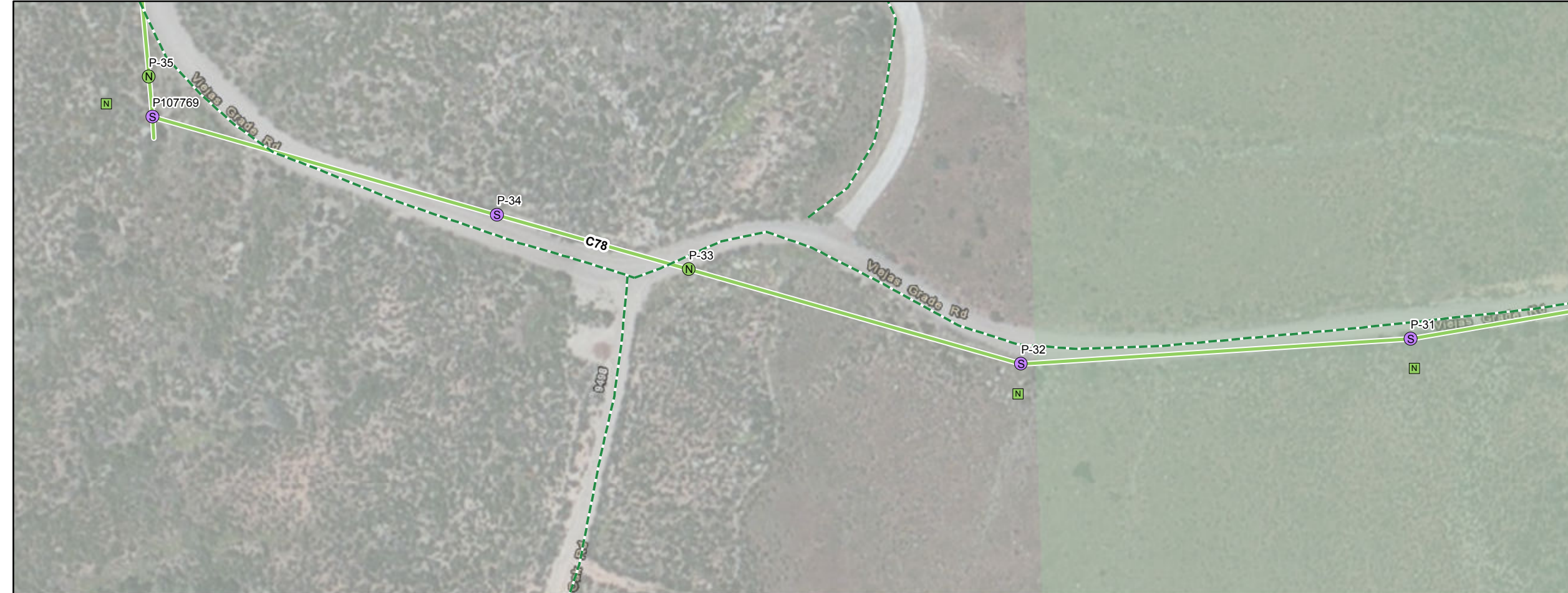
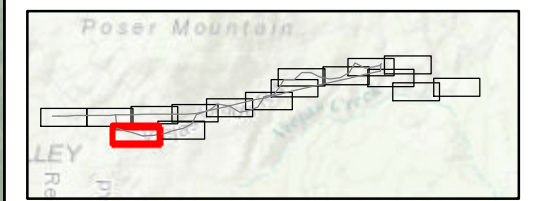


**Attachment D:  
Comparison Map  
C78 Map 3 of 16**






**Cleveland National Forest  
Power Line Replacement Projects**

**2015 Preliminary Design**





-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  New Anchor
-  New Steel
-  Navigation Access Road
-  United States Forest Service

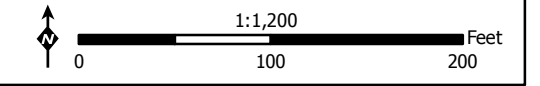


**Final Design (Not Required for MPR)**

-  New Steel Pole
-  New Anchor
-  New Steel
-  Wood-to-Steel Replacement
-  Navigation Access

**MPR #5**

-  Replace Tap Pole
-  New Anchor
-  Stringing Site
-  United States Forest Service






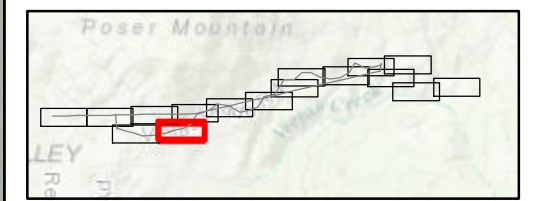
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**Attachment D:  
Comparison Map  
C78 Map 4 of 16**





**Cleveland National Forest  
Power Line Replacement Projects**

**2015 Preliminary Design**



-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  New Anchor
-  New Steel
-  Navigation Access Road
-  United States Forest Service





**Final Design (Not Required for MPR)**


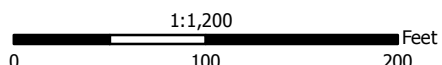
-  New Steel Pole
-  New Anchor
-  New Steel
-  Navigation Access

**MPR #5**

-  New Anchor
-  United States Forest Service













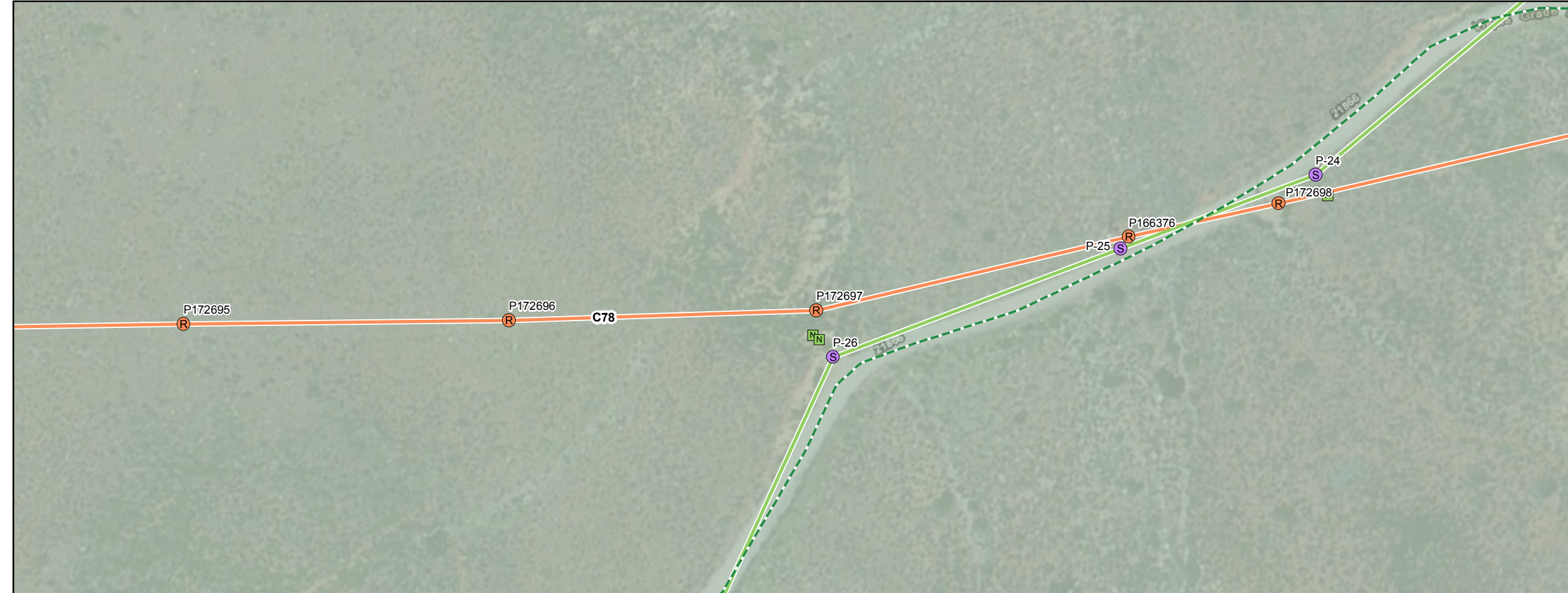
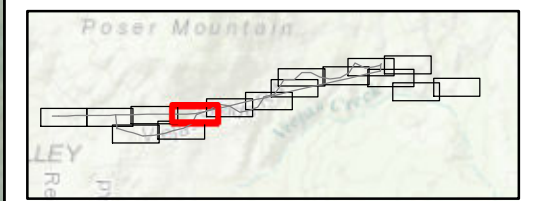



**Attachment D:  
Comparison Map  
C78 Map 5 of 16**











**Cleveland National Forest  
Power Line Replacement Projects**

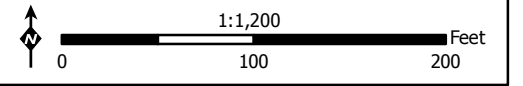
**2015 Preliminary Design**

-  Wood-to-Steel Replacement Pole
-  Removal Pole
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access Road
-  United States Forest Service



**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  Wood-to-Steel Replacement
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access
- MPR #5**
-  New Steel Pole
-  Stringing Site
-  United States Forest Service




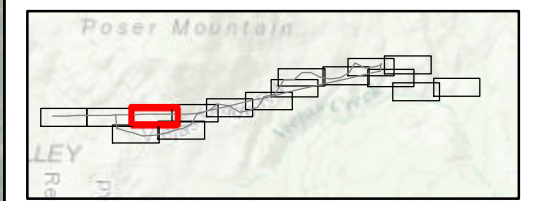
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**Attachment D:  
Comparison Map  
C78 Map 6 of 16**

**Cleveland National Forest  
Power Line Replacement Projects**




**2015 Preliminary Design**

-  Removal Pole
-  Removal
-  United States Forest Service





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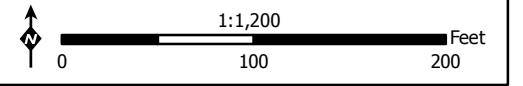
**Final Design (Not Required for MPR)**

-  Removal
-  Removal
-  Navigation Access

**MPR #5**

-  New Anchor
-  United States Forest Service

P172692 P172693 P172694 P172695











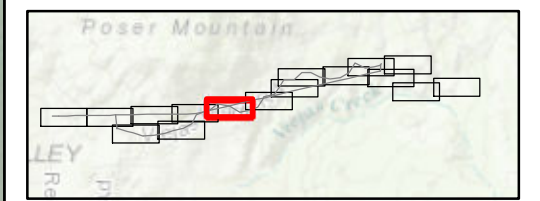
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**Attachment D:  
Comparison Map  
C78 Map 7 of 16**










**Cleveland National Forest  
Power Line Replacement Projects**

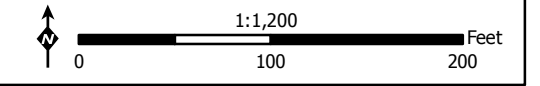
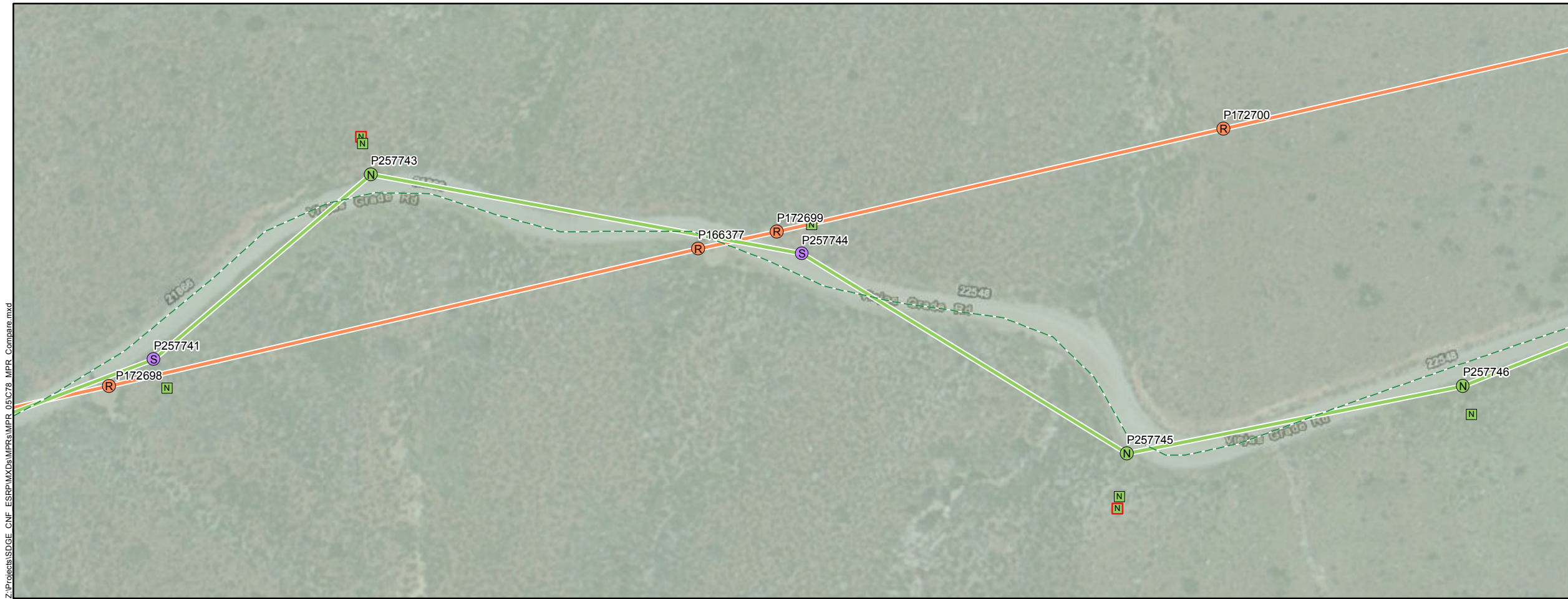
**2015 Preliminary Design**

-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  Removal Pole
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access Road
-  United States Forest Service



**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  Wood-to-Steel Replacement
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access
- MPR #5**
-  New Anchor
-  United States Forest Service











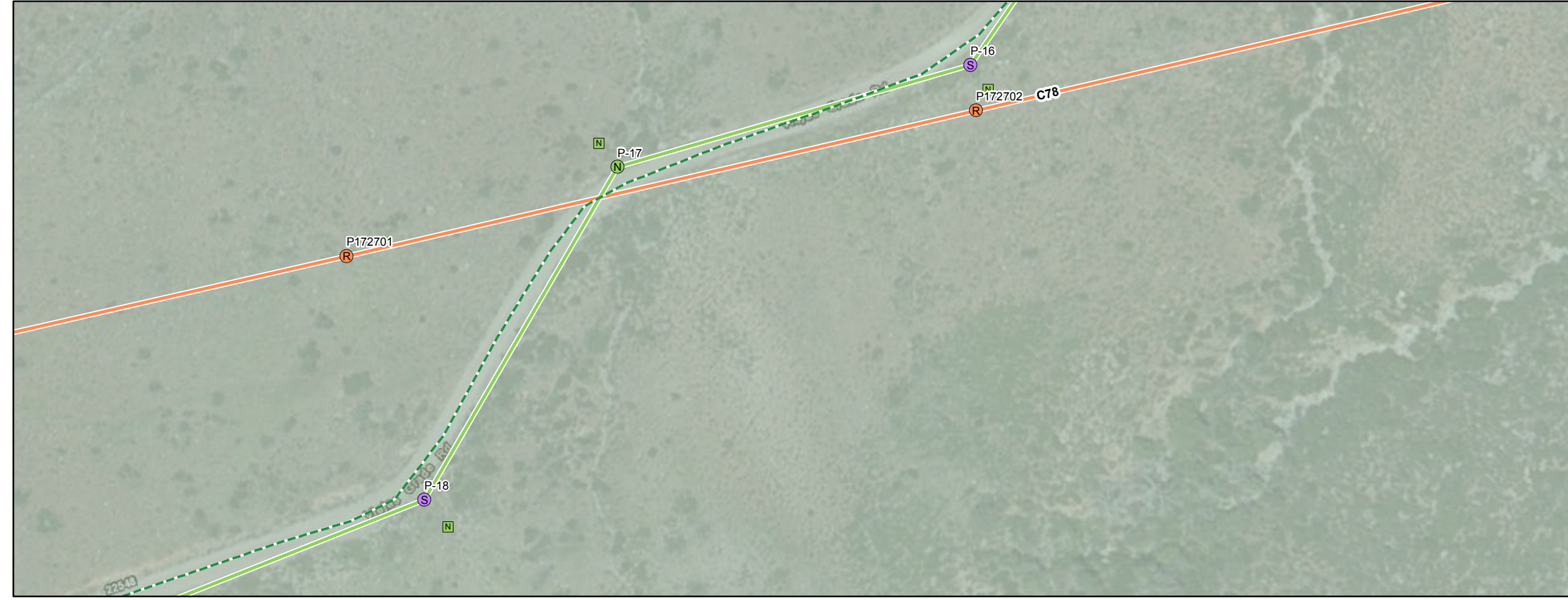
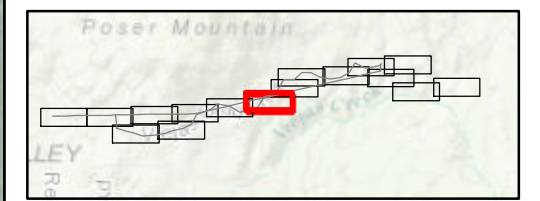
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**Attachment D:  
Comparison Map  
C78 Map 8 of 16**










**Cleveland National Forest  
Power Line Replacement Projects**

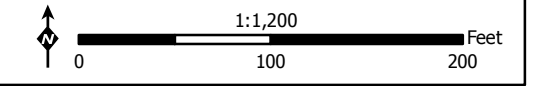
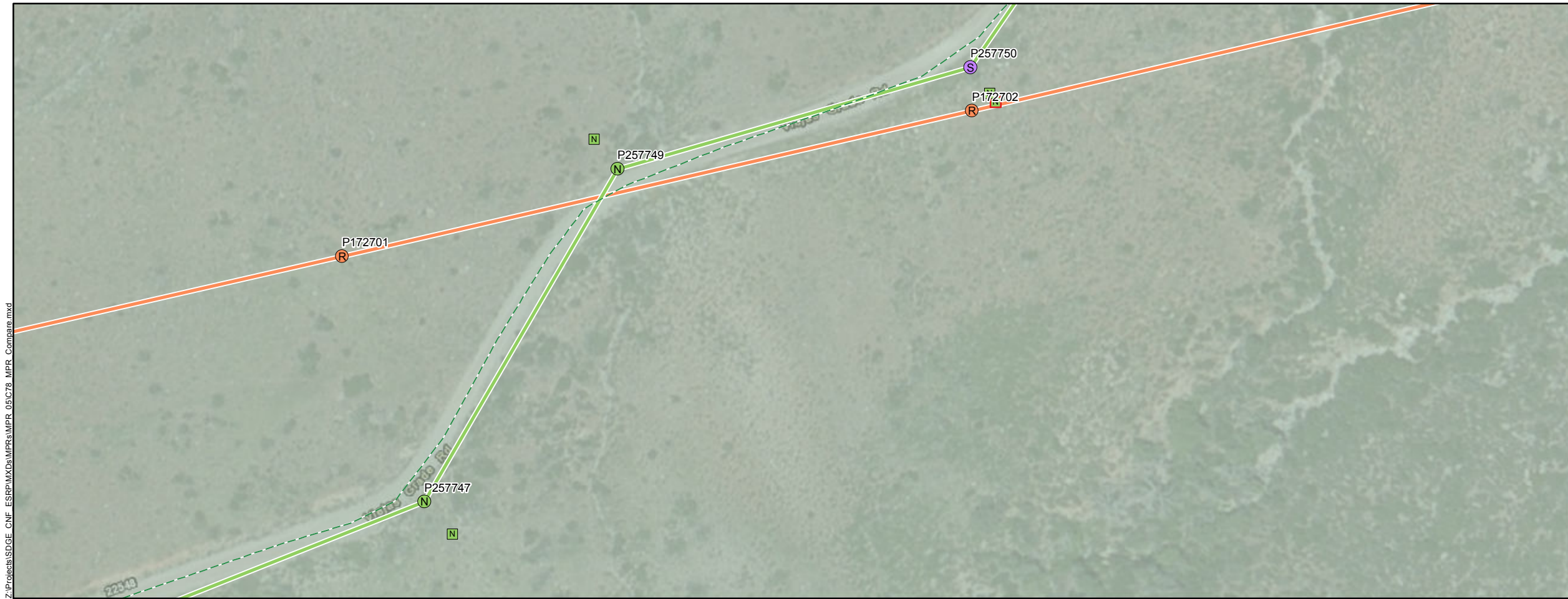
**2015 Preliminary Design**

-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  Removal Pole
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access Road
-  United States Forest Service



**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  Wood-to-Steel Replacement
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access
- MPR #5**
-  New Anchor
-  United States Forest Service











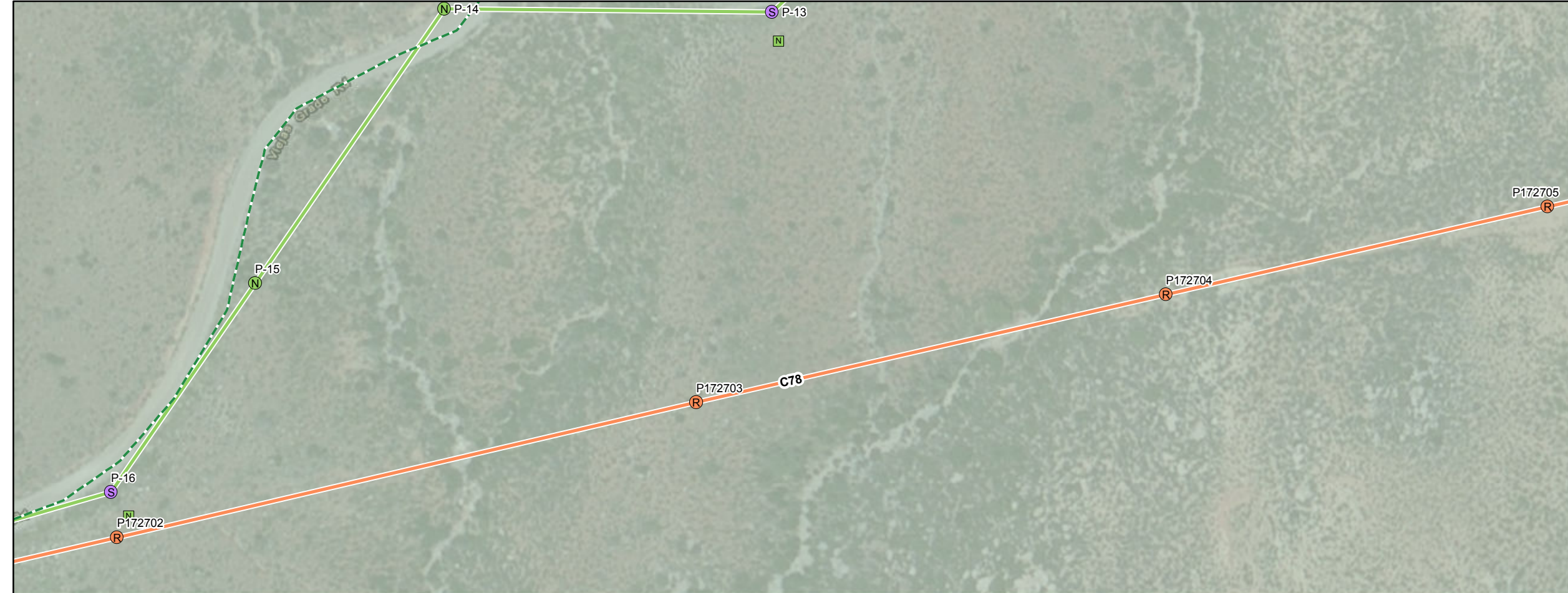
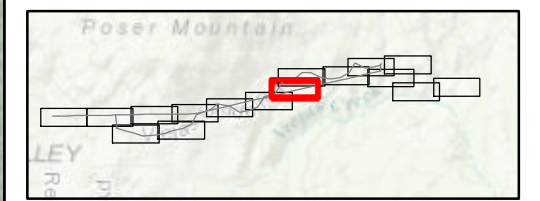
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**Attachment D:  
Comparison Map  
C78 Map 9 of 16**










**Cleveland National Forest  
Power Line Replacement Projects**

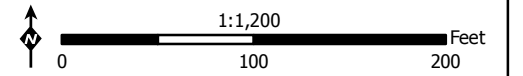
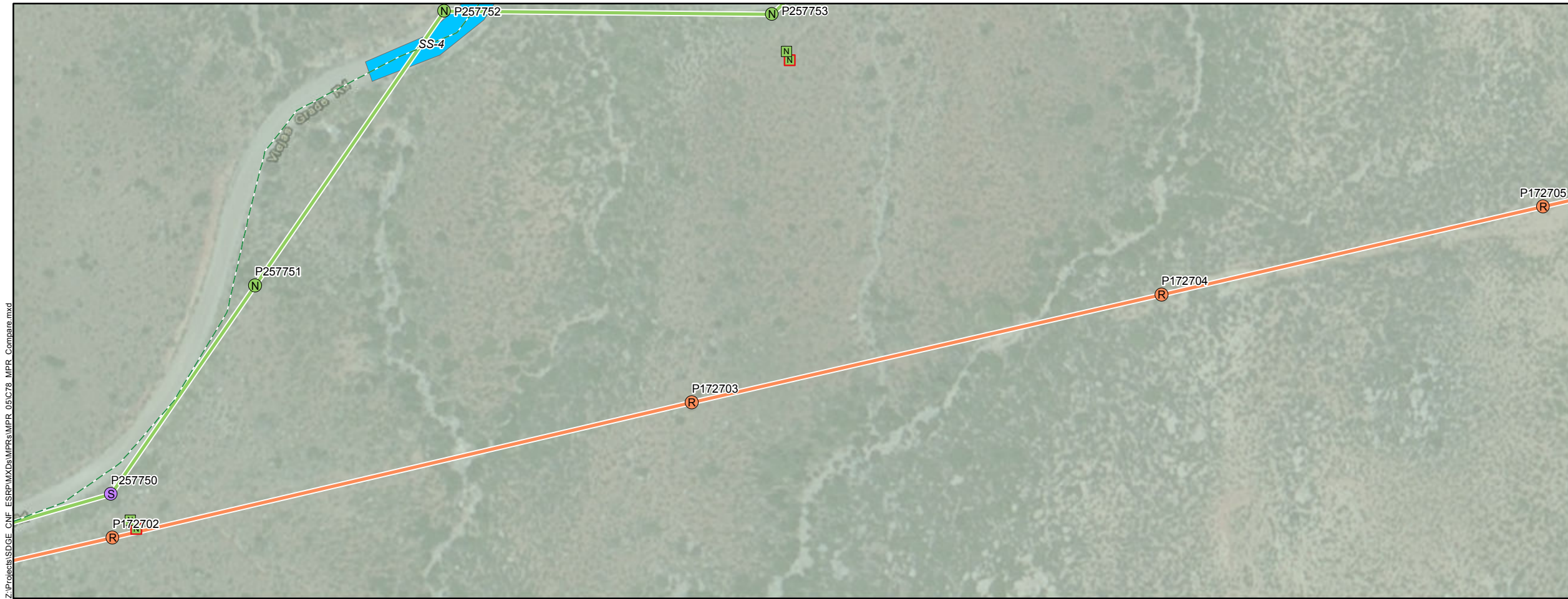
**2015 Preliminary Design**

-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  Removal Pole
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access Road
-  United States Forest Service



**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  Wood-to-Steel Replacement
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access
- MPR #5**
-  Stringing Site
-  United States Forest Service











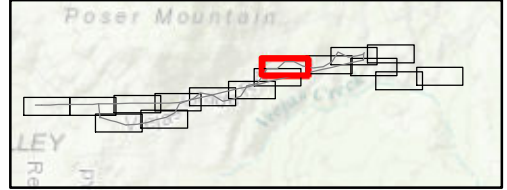
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**Attachment D:  
Comparison Map  
C78 Map 10 of 16**







**Cleveland National Forest  
Power Line Replacement Projects**

**2015 Preliminary Design**



-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  Removal Pole
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access Road
-  United States Forest Service




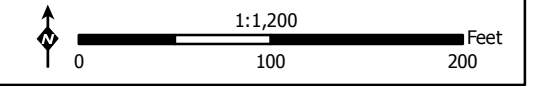
**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  New Anchor
-  New Steel
-  Removal
-  Navigation Access

**MPR #5**

-  New Anchor
-  Stringing Site

 United States Forest Service











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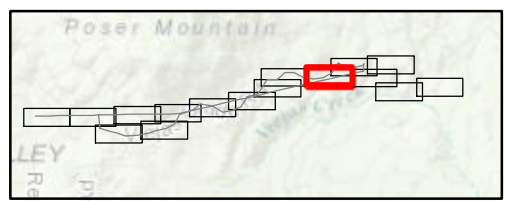


**Attachment D:  
Comparison Map  
C78 Map 11 of 16**










**Cleveland National Forest  
Power Line Replacement Projects**

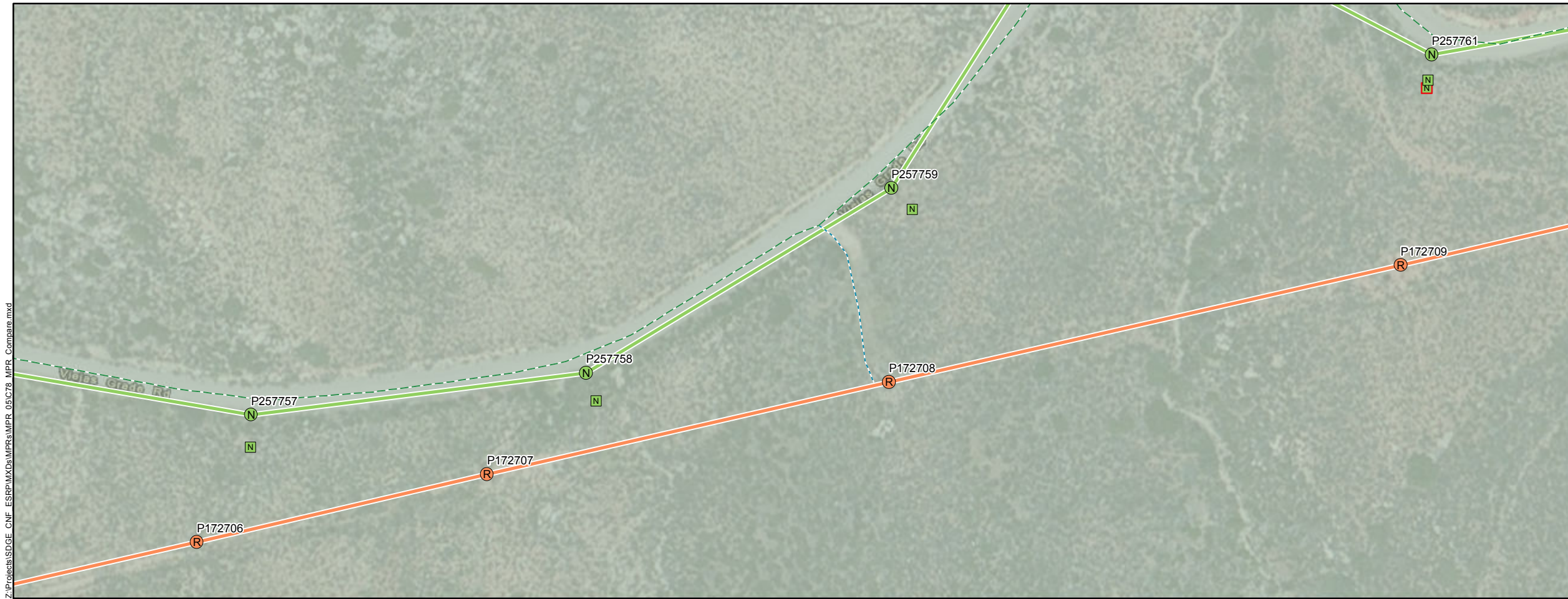
**2015 Preliminary Design**



-  Wood-to-Steel Replacement Pole
-  Removal Pole
-  New Anchor
-  New Steel
-  Removal
-  Construction Only Access
-  Navigation Access Road
-  United States Forest Service


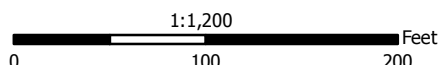


**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  New Anchor
-  New Steel
-  Removal
-  Construction Only Access
-  Navigation Access
- MPR #5**
-  New Anchor
-  United States Forest Service















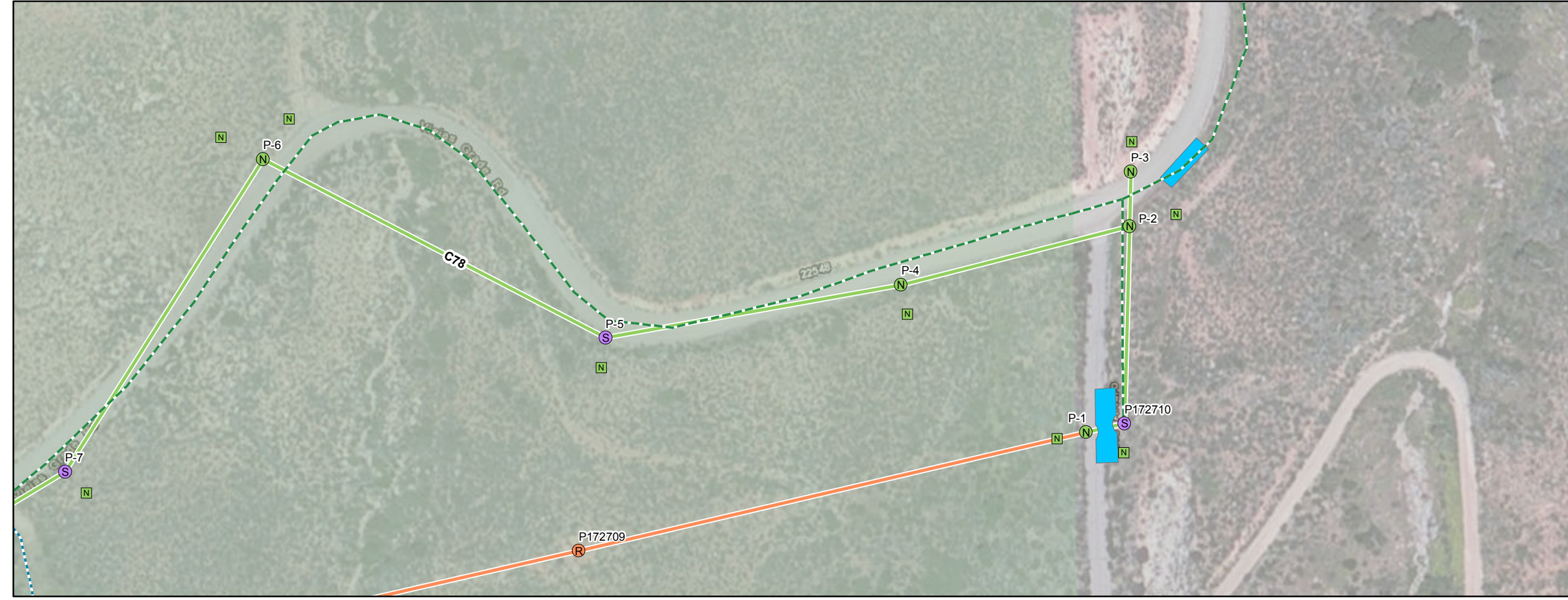
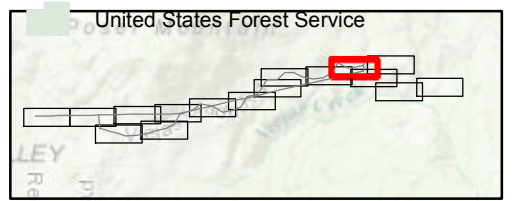
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**Attachment D:  
Comparison Map  
C78 Map 12 of 16**











**Cleveland National Forest  
Power Line Replacement Projects**

**2015 Preliminary Design**




-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  Removal Pole
-  New Anchor
-  Stringing Site
-  New Steel
-  Removal
-  Construction Only Access
-  Navigation Access Road



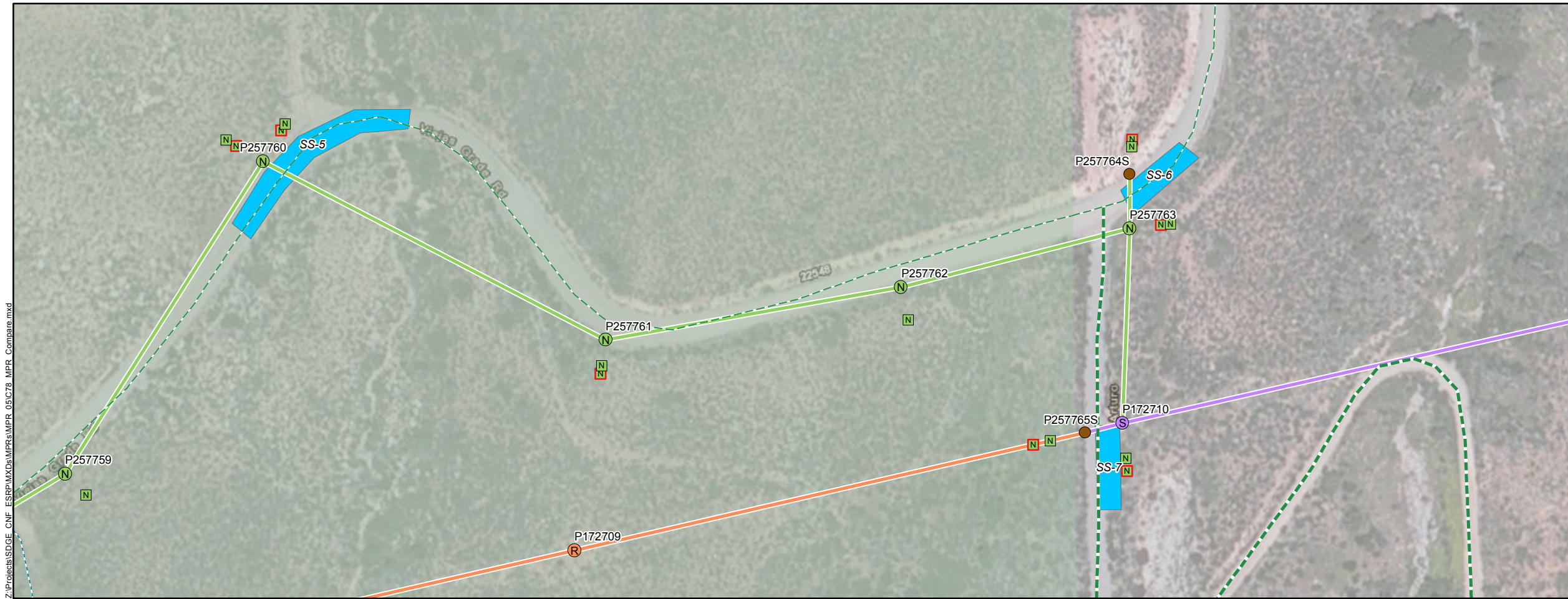
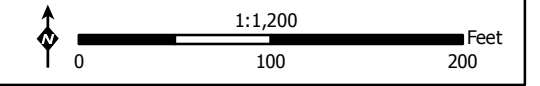
**Final Design (Not Required for MPR)**

-  New Steel Pole
-  Removal
-  Stub
-  Wood-to-Steel Replacement
-  New Anchor
-  New Steel
-  Removal
-  Wood-to-Steel Replacement
-  Construction Only Access
-  Navigation Access

**MPR #5**

-  New Anchor
-  Navigation Access Road
-  Stringing Site

United States Forest Service

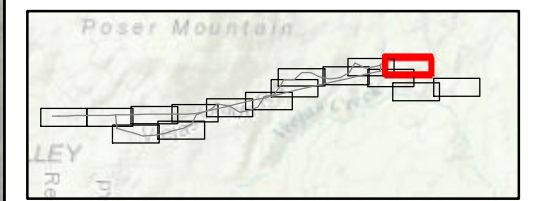


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**Attachment D:  
Comparison Map  
C78 Map 13 of 16**

**Cleveland National Forest  
Power Line Replacement Projects**



2015 Preliminary Design


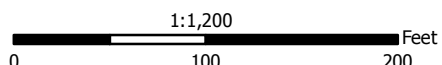


**Final Design (Not Required for MPR)**

-  Wood-to-Steel Replacement
- MPR #5**
-  New Steel Pole
-  Pole Top Work Only
-  Wood-to-Steel Replacement
-  New Anchor
-  Navigation Access Road
-  Staging Area
-  Stringing Site














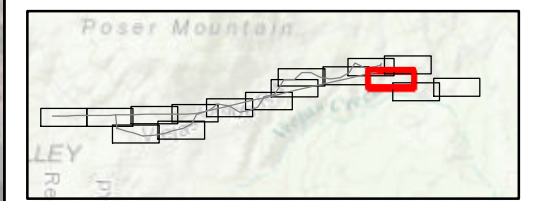
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**Attachment D:  
Comparison Map  
C78 Map 14 of 16**







**Cleveland National Forest  
Power Line Replacement Projects**

**2015 Preliminary Design**





-  Wood-to-Steel Replacement Pole
-  New Steel Pole
-  New Anchor
-  Stringing Site
-  New Steel
-  Removal
-  Navigation Access Road
-  United States Forest Service

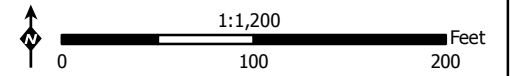


**Final Design (Not Required for MPR)**

-  Stub
-  Wood-to-Steel Replacement
-  New Anchor
-  New Steel
-  Removal
-  Wood-to-Steel Replacement

**MPR #5**

-  New Anchor
-  Navigation Access Road
-  Stringing Site
-  United States Forest Service

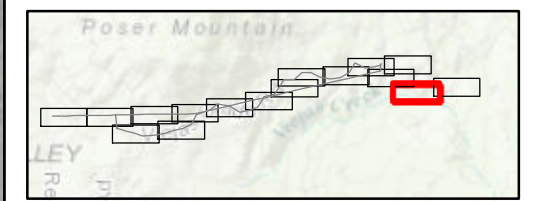


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**Attachment D:  
Comparison Map  
C78 Map 15 of 16**

**Cleveland National Forest  
Power Line Replacement Projects**

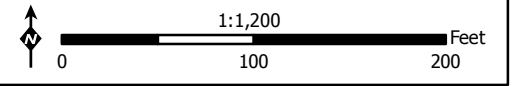
2015 Preliminary Design



**Final Design (Not Required for MPR)**

**MPR #5**

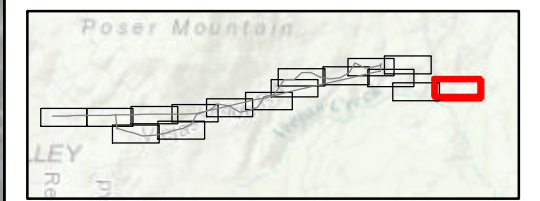
--- Navigation Access Road



**Attachment D:  
Comparison Map  
C78 Map 16 of 16**

**Cleveland National Forest  
Power Line Replacement Projects**

2015 Preliminary Design



**Final Design (Not Required for MPR)**

**MPR #5**

- Navigation Access Road
- Fly Yard/Staging Area



SDGE  
A Semptra Energy Utility

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1:1,200 Feet  
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