

# CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS



# A Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM

Date Submitted:	07-31-18; Revised 08	3-22-18	Request #:		020		
Date Approval Required:	08-14-18		Landowner: States For		Frye, United orest Service and City of San		
APN:		XXX-XXX-XX, XXX-XXX-XX, XXX-XXX-XX, XXX-XXX-					
Refinement from (check all	that apply):						
☐ Mitigation Measure	$\Box$ APM	□ Pro	oject Description	$\boxtimes$	Drawing		Other
<b>Identify source (mitigation</b>	measure, project desc	cription,	etc.):				
Notice to Proceed (NTP) request #14 and Minor Project Refinement (MPR) request #17 were approved by the California Public Utilities Commission (CPUC) and the USFS on June 26, 2018. Since the submittal and approval of NTP request #14 and MPR request #17, San Diego Gas & Electric Company (SDG&E) has determined that additional road maintenance and temporary access work areas are required to complete construction on Circuit (C) 157.					oproval hat		
The information in this MPR and justification of the refine				along	C157. At	orief descr	iption
Attachments (check all that	apply):						
(see Attachment A: Minor   Photos   Attachment R:			(See Attachment C: npacts Table)				
Under Order 2 of the Decision Granting SDG&E Permit to Construct the Cleveland National Forest Power Line Replacement Projects (D.16-05-038), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 2 of the Decision, respond "yes" or "no" to the following questions (a) through (d).							
(a) Is the proposed refinem area?	ent outside the geogra	phic bo	undary of the EIR	EIS st	udy		
The requested refinements are located within the geographic boundary of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. Some of the refinements occur outside of the baseline survey areas and approved NTP work areas; therefore, supplemental hydrological, biological, and cultural resources surveys were conducted in 2016, 2017, and 2018. Additional details regarding the specific surveys conducted can be found in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form.				⊠ No			
(b) Will the proposed refine increase in the severity of a used in the EIR/EIS?						□ Yes	⊠ No

(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?	☐ 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 C157:						
<ul> <li>addition of 27 temporary access/entry/turnaround work areas to provide safe access, veh and parking;</li> </ul>	iicle turnar	ound,				
<ul> <li>conversion of approximately 0.35 mile of a navigation access road to a construction-only access clearing and minor grading may occur); and</li> </ul>	ess road (ve	getation				
	<ul> <li>addition of one temporary pole work area at Pole P258090 and reconfiguration/enlargement of two</li> </ul>					
Attachment B: Comparison Map depicts the facilities and workspaces approved in NTP request #14 and MPR request #17 in comparison to the refinements requested in this MPR request. The activities associated with the construction and utilization of the refinement areas will occur in the same manner as described in the Final EIR/EIS for construction of the Cleveland National Forest Power Line Replacement Projects (Project). The requested refinements will result in an increase of up to 1.30 acres of temporary impacts (of which approximately 0.29 acre is classified as native vegetation). The breakdown of the temporary impacts is summarized in Attachment C: Impacts Table.						
Provide need for refinement (attach drawings and photos as needed):						
SDG&E is requesting the refinements for the following reasons:						
<ul> <li>Due to restrictions on vehicle access across a privately owned bridge (Dad's Bridge), the access/entry/turnaround work areas will be used to maintain open access for the landow provide safe emergency evacuation routes and fire support vehicle access for the Project work areas will allow ingress/egress without extended periods of backing up and will p space for parking vehicles and equipment.</li> </ul>	vner, as well et. In addit	ll as ion, the				
<ul> <li>To facilitate construction access for crew trucks, compressor trucks, and fire support, sections of the approved navigation access road were identified as requiring additional maintenance (i.e., grading) during construction. As a result, those sections will be changed from a navigation access road to construction- only access road.</li> </ul>						
<ul> <li>Additional and enlarged temporary pole work areas at Poles P258090 and P258098 will landing of a water buffalo and air compressor directly within the pole work areas by he landing equipment directly on site, the risk of slips and falls from hiking to the sites wit will be greatly reduced.</li> </ul>	licopter. B	Ву				
<ul> <li>The reconfigured pole work area at Pole P285105 will allow for direct conventional accordance.</li> </ul>	cess from S	kye				

 $^{1}$  A few of the refinements overlap with previously approved workspaces. Therefore, any area that overlaps is not included in the temporary totals.

08-15-18

Date refinement is expected to be implemented:

Resource Agency Coordinati	on				
Resource Agency	Name	Action Required	Date		entation hed if yes)
Not Applicable (N/A)	N/A	N/A	N/A	□ Yes	□ No

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, 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 the details on the Project 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 <sup>2</sup> : Significant and unavoidable (Class I)/Adverse and unavoidable				
Summary of Proposed Minor Project Refinement Impacts o	n Visual Resourc	es:		
The requested refinements will be consistent with the visual resource analysis as defined in the Final EIR/EIS and will not impact scenic vistas or roadways. Impacts to the visual character of the area may occur as a result of minor grading and vegetation clearing; however, these minor impacts will be temporary and reduced with 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.				
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 o	n Air Quality:	l	l	

<sup>2</sup> The Final EIR/EIS evaluations of impact significance are provided for each resource; this table notes the most significant determination within each resource section identified in the Final EIR/EIS.

Activities associated with construction and utilization of the requested refinement areas (e.g., the type of equipment used and the number of truck trips) will be consistent with those discussed in the Final EIR/EIS and will not increase air emissions beyond what was analyzed. The refinement areas are located within 1,000 feet of two sensitive receptors, which is consistent with Notice to Proceed (NTP) request #14 and the 2015 baseline data. The additional minor grading and vegetation clearing required for the refinement areas may result in a minor increase in air quality impacts in localized areas. However, these activities will be short term and temporary; and with the implementation of APM AIR-01 through APM AIR-05, use of the refinement areas will be consistent with the analysis in the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in the Final EIR/EIS.

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

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

Some of the requested refinement areas were previously surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial surveys that were conducted for the Project. In addition, the requested refinement areas were surveyed in 2018 during engineering field reviews. Other supplemental surveys conducted along the Circuit (C) 157 alignment included a 2016 bat roost assessment and focused surveys for Townsend's big-eared bat (Corynorhinus townsendii) and other common bat species, as well as a 2018 bat roost assessment of areas that were previously not accessible due to landowner access. In addition, 2016 and 2017 focused surveys were conducted for rare plants and Hermes copper butterfly (Lycaena hermes).

The requested refinements will result in approximately 1.30 acres of temporary impacts. This includes approximately 1.01 acres of temporary impacts to developed/disturbed areas and approximately 0.29 acre of total impacts to the following vegetation communities:

- approximately 0.07 acre of Diegan coastal sage scrub,
- approximately 0.01 acre of mixed oak woodland,
- approximately 0.10 acre of native grassland, and
- approximately 0.11 acre of southern mixed chaparral.

Special-status butterfly host plants and special-status plant species—including spiny redberry (Rhamnus crocea) and delicate clarkia (Clarkia delicata)—are located within or adjacent to the requested refinement areas. Impacts to these plants will be avoided to the maximum extent possible by installing fencing/flagging near the known locations.<sup>3</sup> Less than 0.01 acre of temporary impacts to suitable Hermes copper butterfly habitat will occur. In addition, approximately 0.13 acre of temporary impacts to United States (U.S.) Fish and Wildlife Service-(USFWS-) designated critical habitat for arrovo toad (Anaxyrus californicus) will occur, and approximately 0.12 acre of temporary impacts to U.S. Forest Service (USFS) occupied habitat for arroyo toad will also occur. The refinement areas that occur within 500 feet of USFWS-designated critical habitat and USFS occupied habitat for arroyo toads will be included in the approved Arroyo Toad Monitoring and Relocation Plan (Plan). No additional protective measures (i.e., exclusion fencing) are required for these refinement areas. Work in these refinement areas will be monitored by a qualified arroyo toad biologist per the Plan and Mitigation Measure (MM) BIO-33. All APMs and 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 additional temporary impacts to these species. Thus, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final EIR/EIS.

<sup>&</sup>lt;sup>3</sup> Per the Project's approved Special-Status Plant Species Salvage and Relocation Plan, no treatment is required for these plant species.

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			

The majority of the requested refinement areas were previously surveyed for cultural resources during pre-construction and cultural resources inventory work in 2011, as described in the *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 (Schaefer and Williams, 2011 [Revised 2013]). Supplemental intensive pedestrian surveys were conducted by ASM Affiliates, Inc. in 2016 and 2017 for NTP request #14, and in 2018 for the refinement areas that were identified as being outside of the 2011 survey area. Five new cultural resources were recorded during the 2018 supplemental surveys, and two refinement areas were identified within one previously recorded cultural resource boundary. Environmentally sensitive area fencing will be installed at the edge of the roads and work areas to avoid impacts to cultural resources. The two refinement areas located within the previously recorded resource will have additional protective measures to reduce impacts to less than significant, including matting, limiting any vegetation clearing to hand-clearing only, and not allowing grading within the cultural resource boundary. Further 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 Minor Project Refinement request. All of the refinements are located within the Project's area of potential effect, as defined in the Project's Programmatic Agreement. In conclusion, the avoidance and protection measures implemented for the requested refinement areas will reduce the level of impacts to less than significant.

The requested refinement areas are underlain by geologic rock units/formations assigned a rank of Potential Fossil Yield Classification (PFYC) Class 1 (very low sensitivity) and Class 2 (low sensitivity). Because none of the refinements require pole installation underlain by rock units with a PFYC Class 3 (moderate or unknown sensitivity) ranking, additional paleontological monitoring and an update to the Paleontological Monitoring & Treatment Plan will not be required. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to paleontological resources as identified in the Final EIR/EIS.

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 construction and utilization of the requested refinement areas are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional minor grading and vegetation clearing will occur, they 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 due to the small change in acreage. 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.

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
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 on Public Health and Safety:

The requested refinements occur within the area assessed in the Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California. No known hazardous materials sites are located in the requested refinement areas. Some of the refinement areas are located adjacent to Camp Barrett. However, with the implementation of MM PHS-1 and MM PHS-2, the potential to create a significant hazard to Camp Barrett through the release of hazardous materials will be substantially reduced, which is consistent with the analysis in the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public health and safety as identified in the Final EIR/EIS.

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

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

The requested refinement areas are located within the Very High Fire Hazard Severity Zone, which is consistent with the Fire and Fuels Management analysis in the Final EIR/EIS. The potential risk of wildfire ignition and spread associated with the refinement areas will be managed in compliance with the Project's Construction Fire Prevention/Protection Plan. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to fire and fuels management as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist				
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable	
Hydrology and Water Quality (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)?  Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable	×			

#### Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:

C157 was surveyed for the presence of waters of the state and/or the United States (U.S.) (i.e., jurisdictional wetlands or non-wetland waters) during initial surveys that were conducted for the Project. In addition, supplemental water resource surveys of the refinement areas were conducted in 2018 during engineering field reviews. Although some of the refinement areas are located near Barrett Lake, Pine Valley Creek, and smaller ephemeral drainages, impacts to these waters will be avoided. Therefore, impacts to waters of the state and/or U.S. will be avoided, and no jurisdictional water permitting will be required from the California Department of Fish and Wildlife, Regional Water Quality Control Board, or the U.S. Army Corps of Engineers. To minimize potential impacts from erosion and off-site sedimentation during construction, the refinement areas will be included in a Change of Information (COI) to the Storm Water Pollution Prevention Plan for Transmission Line 6957 and C157 (Waste Discharge Identification No. 9 37C382650). The COI will be submitted to the State Water Resources Control Board's Storm Water Multiple Applications and Report Tracking System. 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 hydrology and water quality as identified in the Final EIR/EIS.

Land Use (e.g., disturb land uses at or near the Project components, divide an established community, or conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the Project)?	$\boxtimes$	
Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable		

# Summary of Proposed Minor Project Refinement Impacts on Land Use:

In accordance with the Construction Notification Plan and MM LU-1, property owners within 1,000 feet of C157 were notified of construction activities in association with NTP request #14 on March 21 and June 1, 2018; and the property owners within 1,000 feet of the refinement areas were included in that notification process. The requested refinements will not introduce a new land use, establish a permanent barrier or obstacle between uses, or create a physical division or separation of use. In addition, the requested refinements will not conflict with the applicable land use plans, policies, or regulations of an agency with jurisdiction over the Project, as they are located in the same County of San Diego land use and zoning designations and CNF Land Management Plan land use zones that were analyzed in the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to land use as identified in the Final EIR/EIS.

No Change	Potentially Significant Change	Not Applicable
$\boxtimes$		
n Naisa.		
14 and the 2015 batels. However, the ementation of noisement areas will be the sult in a new signi	aseline data. Use construction acti -related MMs and the same as those ficant impact or	of the vities will be d APMs, noise analyzed in the
×		
n Public Services	and Utilities:	
es and utilities anal ion, any applicable -1. Therefore, the	ysis in the Final refinements wil requested refine	l be included in ments will not
		1
	on Noise: the requested refine effinement areas are 14 and the 2015 basels. However, the mentation of noisement areas will be the sult in a new signification as identified in the property of	No Change  Significant Change  On Noise:  the requested refinement areas due to the requested refinement areas are located within 1 114 and the 2015 baseline data. Use the result in a new significant impact or the result in a new significan

Like the 2015 baseline components that were analyzed in the Final EIR/EIS, the requested refinements will be located adjacent to the Pine Creek Wilderness, Hauser Wilderness, Barrett Lake, and Barrett Lake Trail, as well as along Skye Valley Trail. However, use of the refinement areas will not reduce or preclude access or visitation to these recreational areas, nor will they increase the possibility of unauthorized access to specially designated or restricted areas, which is consistent with the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to recreation as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist				
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable	
<b>Transportation and Traffic</b> (e.g., conflict with an applicable congestion management program or a plan, ordinance, or policy associated with the circulation system or alternative transportation; increase hazards due to a design feature; or result in inadequate emergency access)?				
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse				

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

The requested refinements will not require additional or different types of construction vehicles and equipment than those discussed in the Final EIR/EIS for construction of the approved Project. In addition, the total number of truck trips associated with construction of the Project will not change, and the requested refinements will affect the same roadways analyzed in the Final EIR/EIS (e.g., Skye Valley Road and USFS roads), as well as some smaller private roads. With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to area roadways 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.

# ATTACHMENT B: COMPARISON MAP





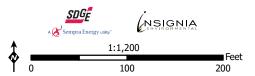


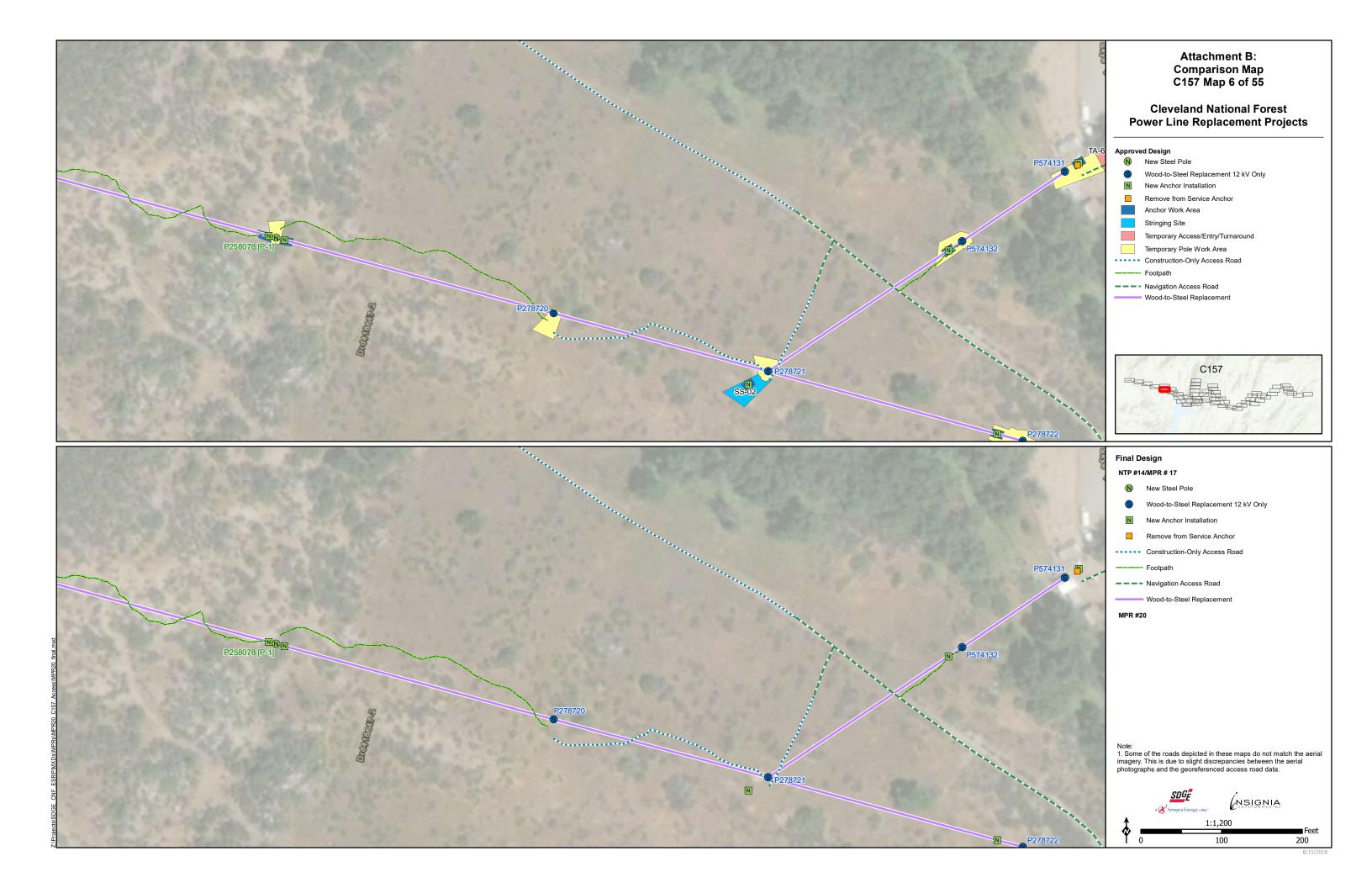




Note:

1. Some of the roads depicted in these maps do not match the aerial imagery. This is due to slight discrepancies between the aerial photographs and the georeferenced access road data.











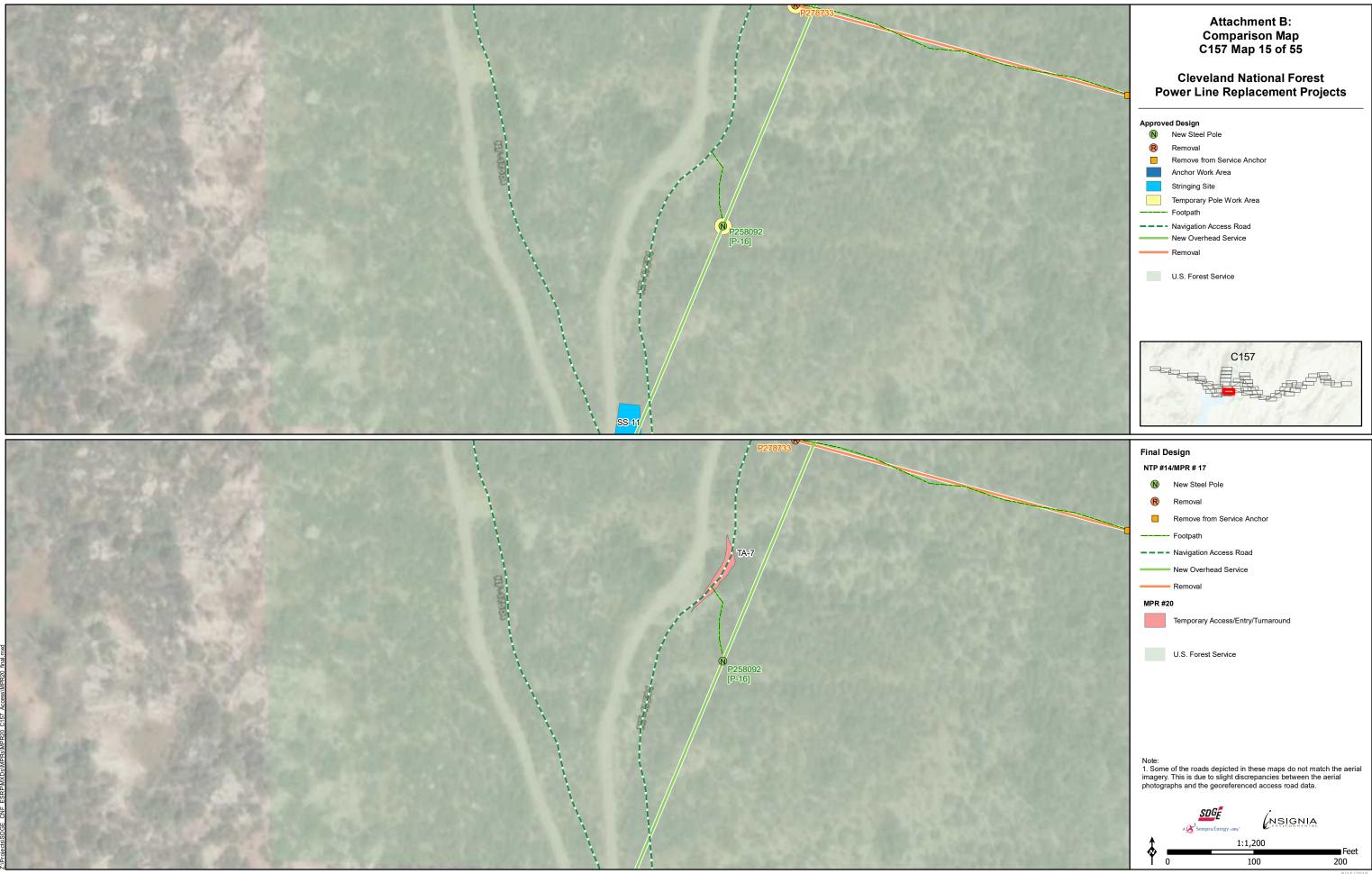








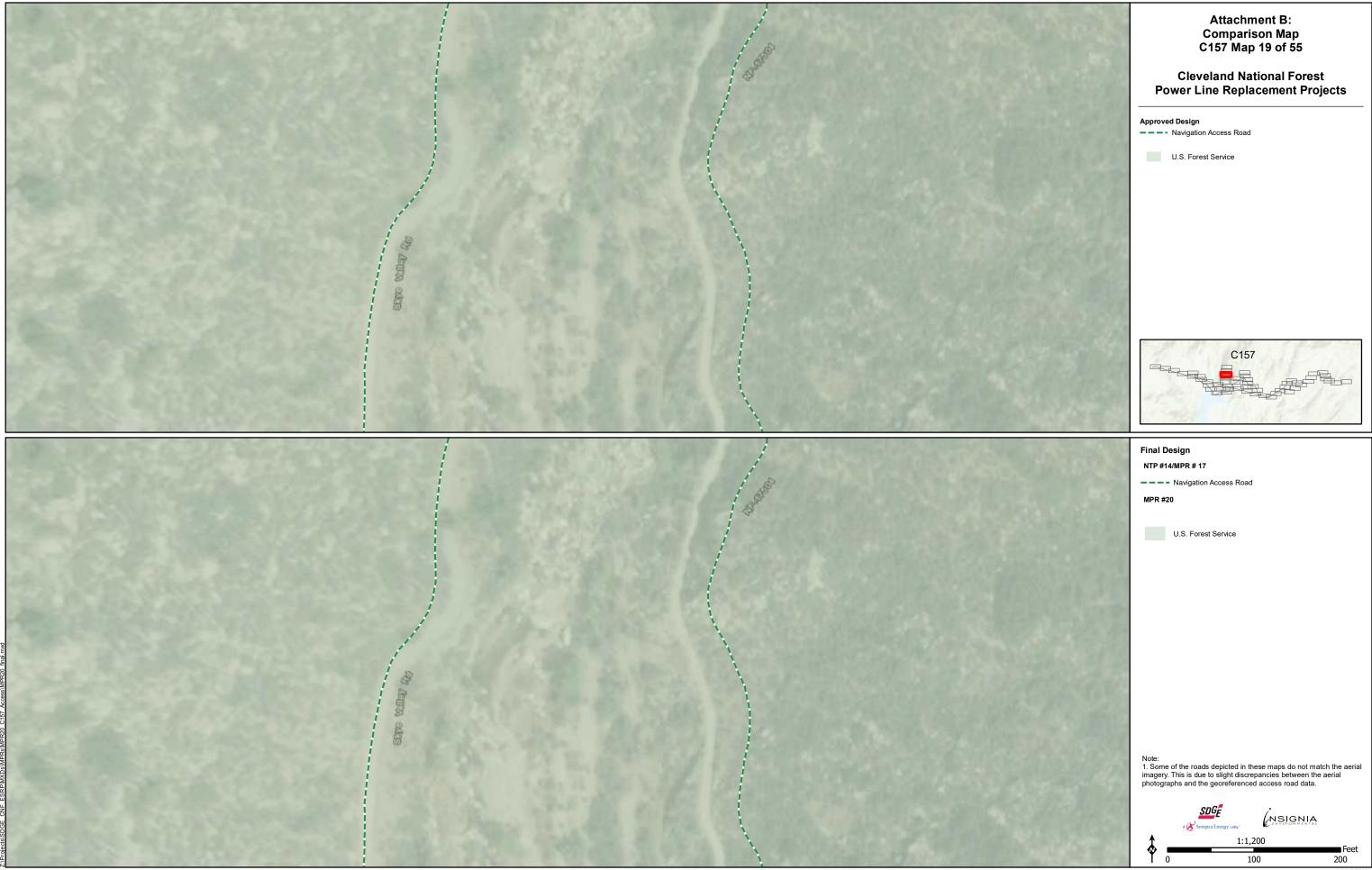


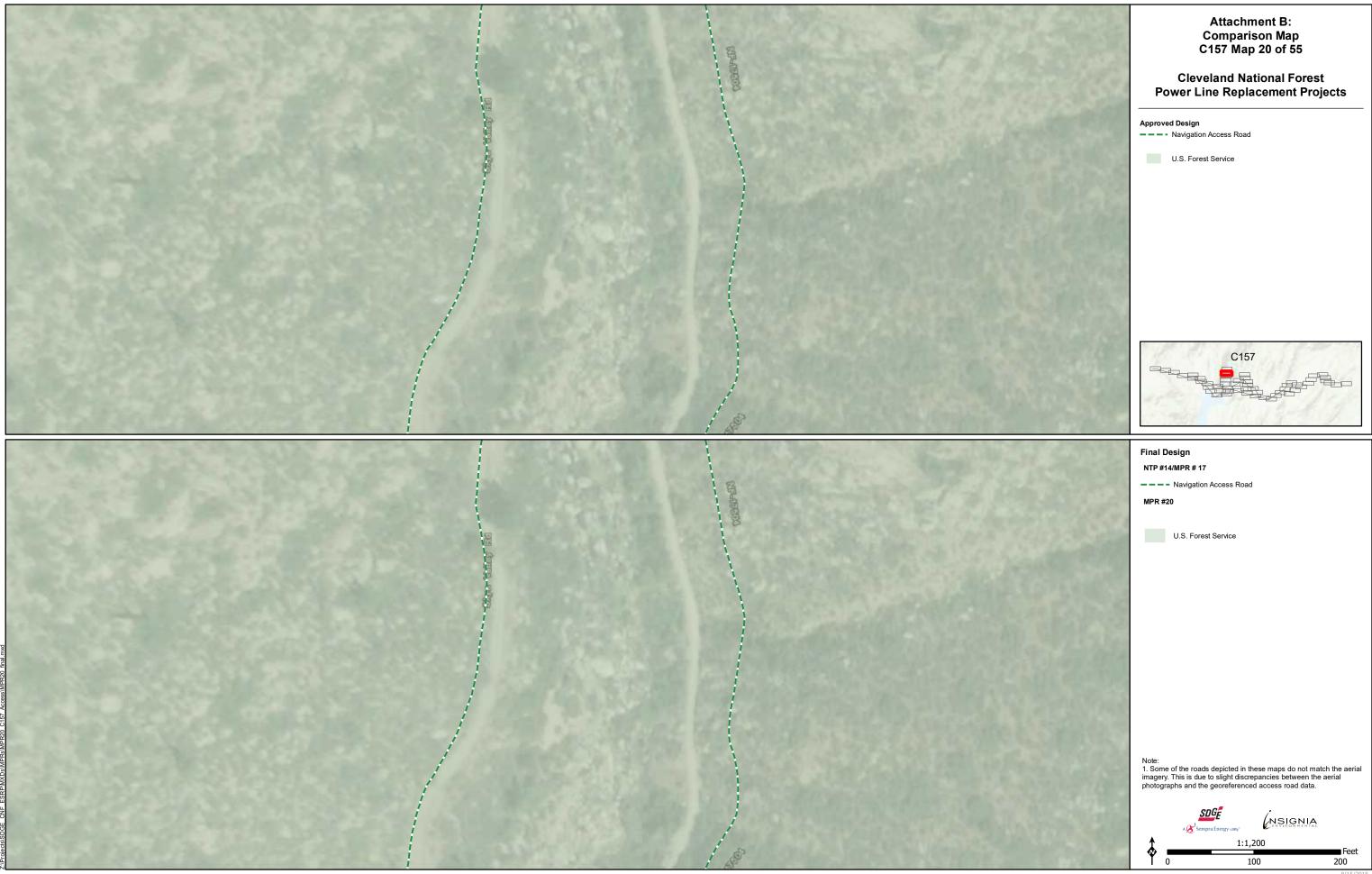


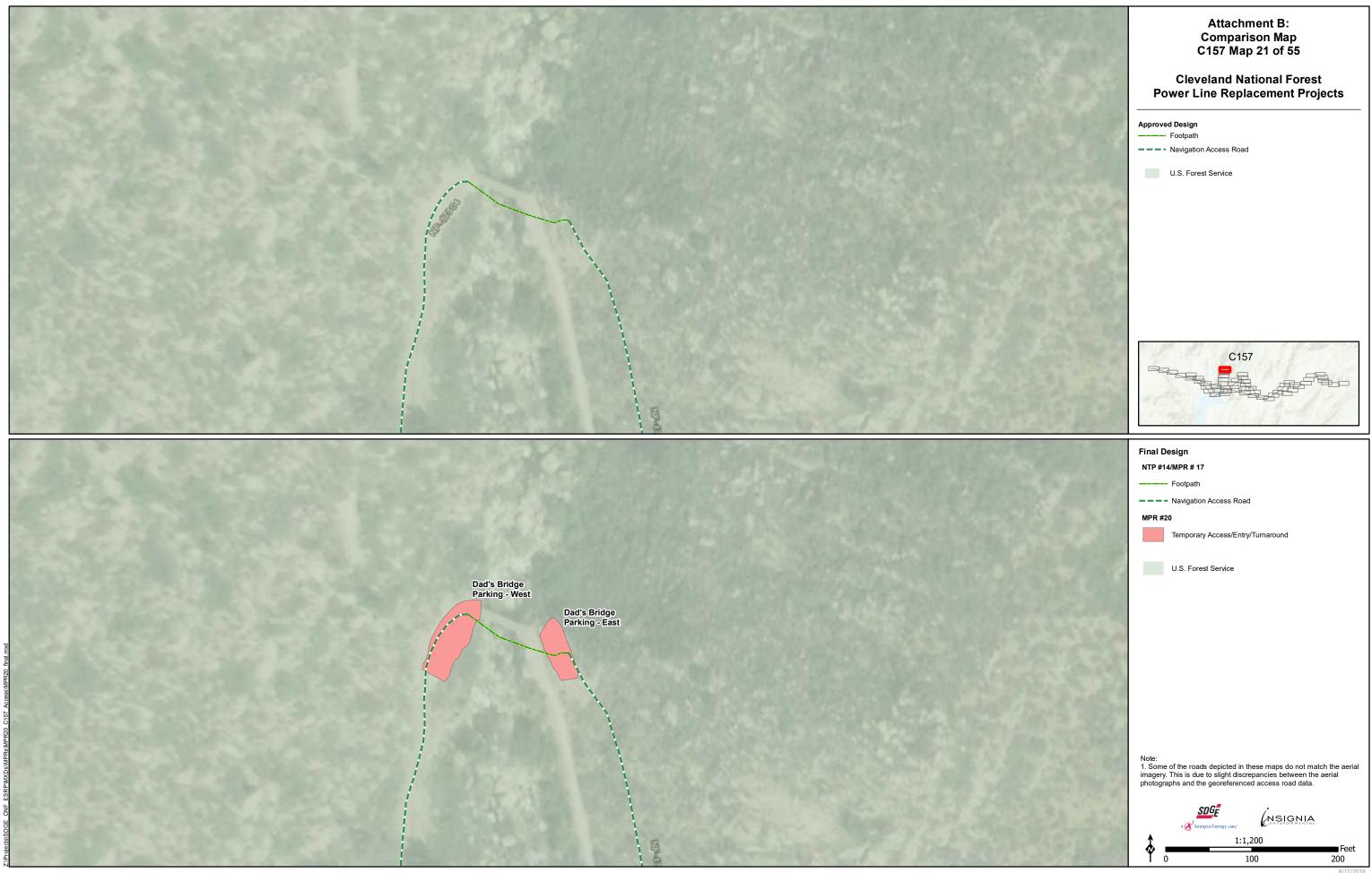












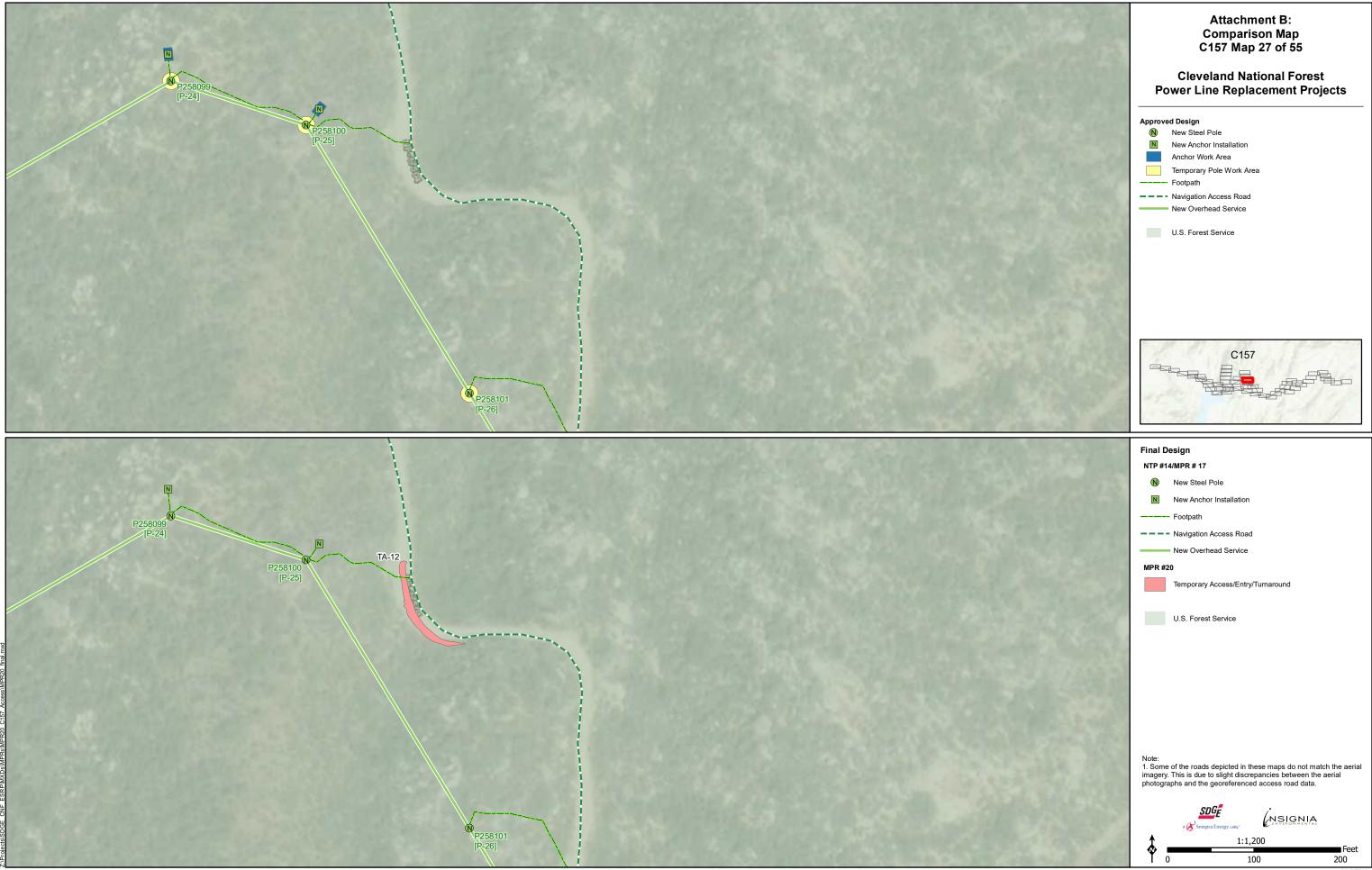












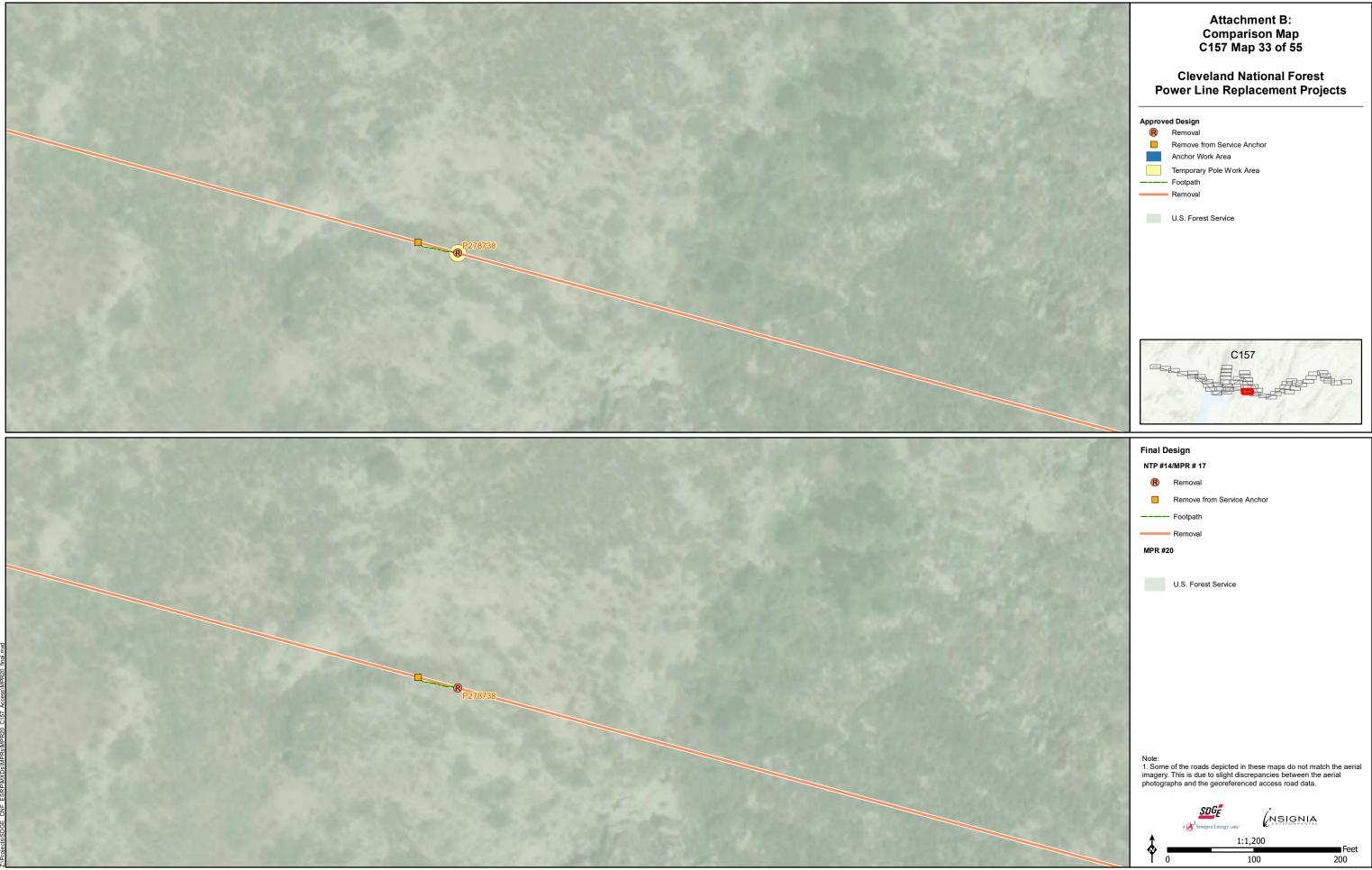


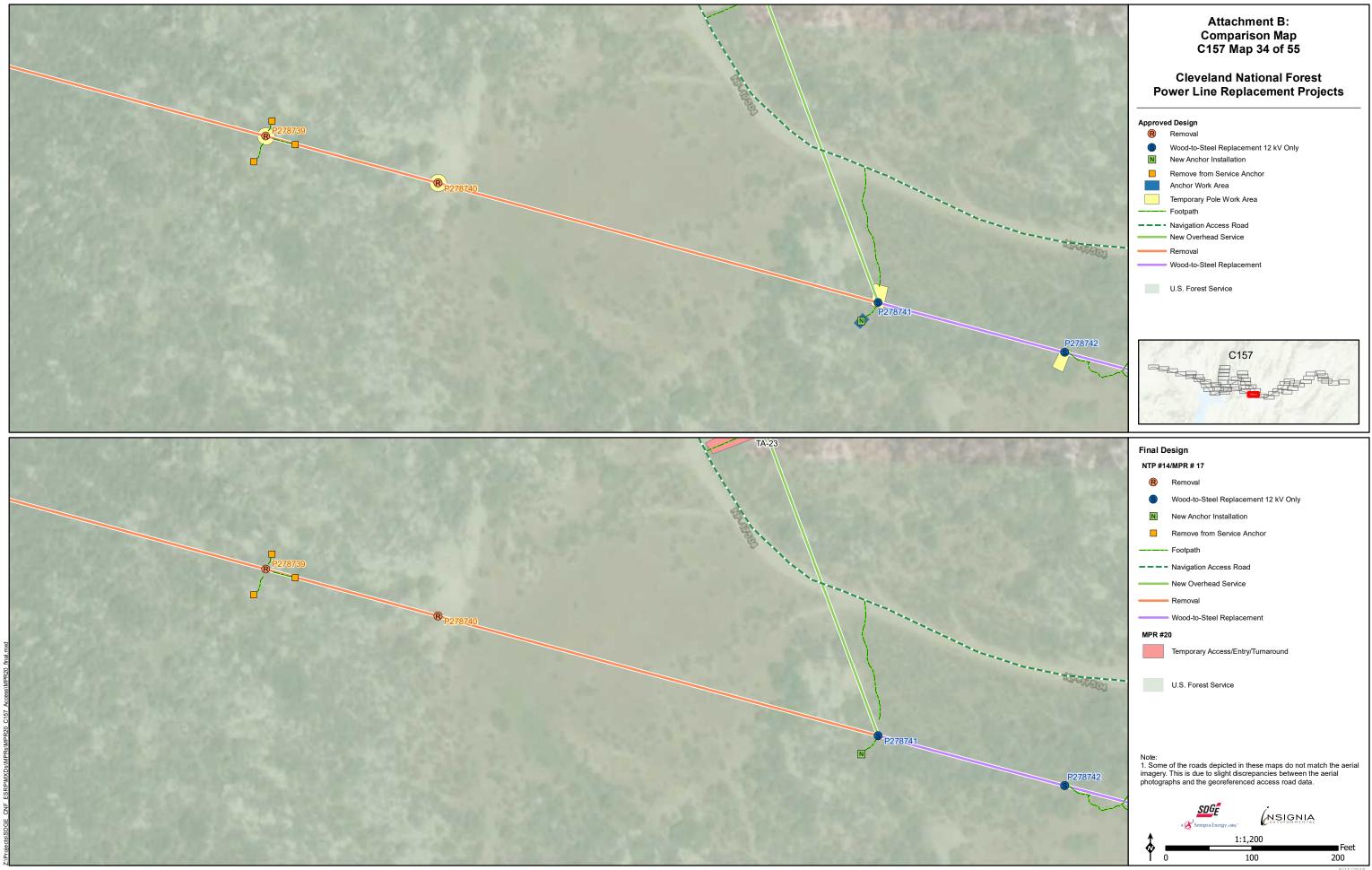


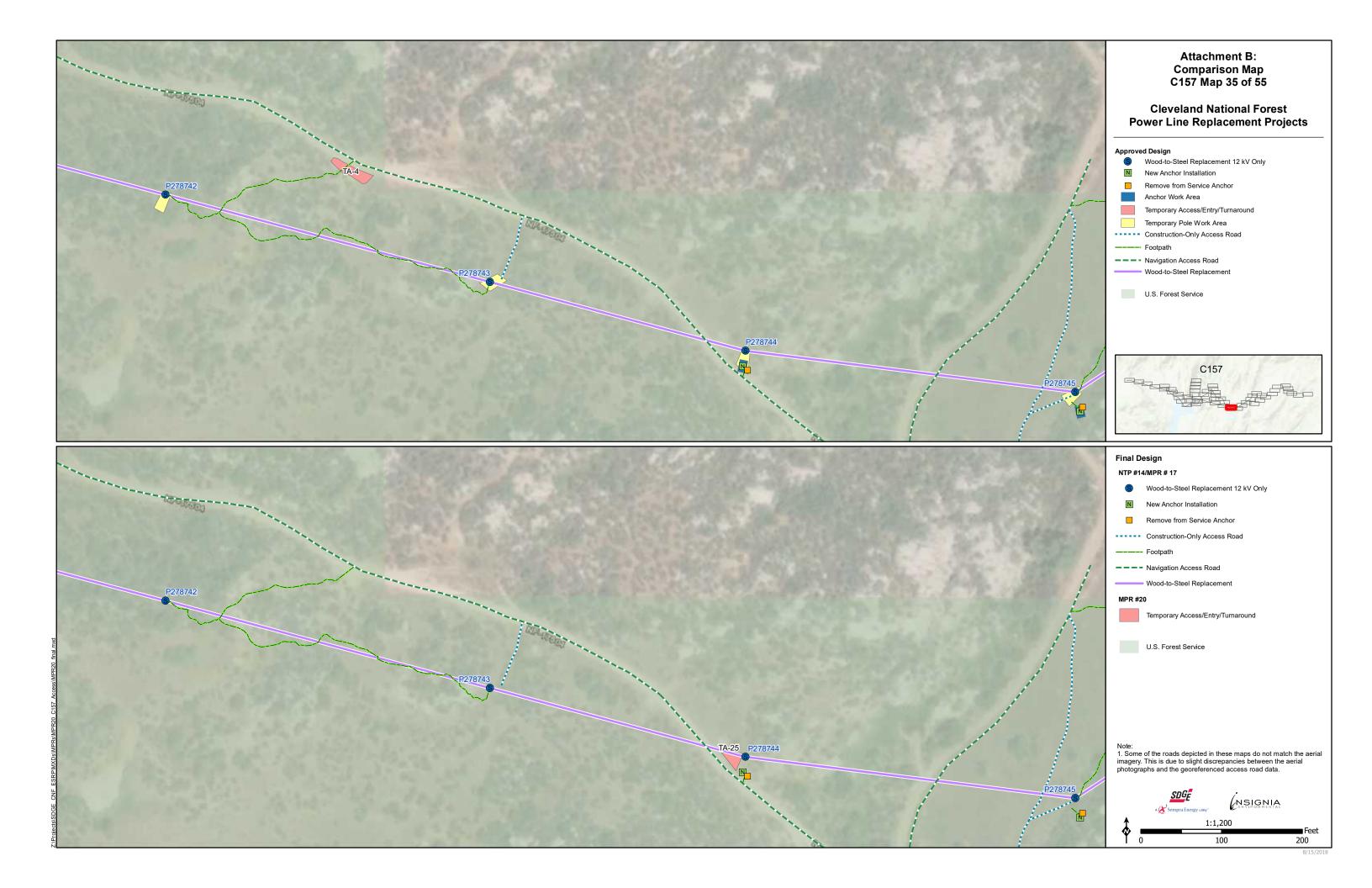






















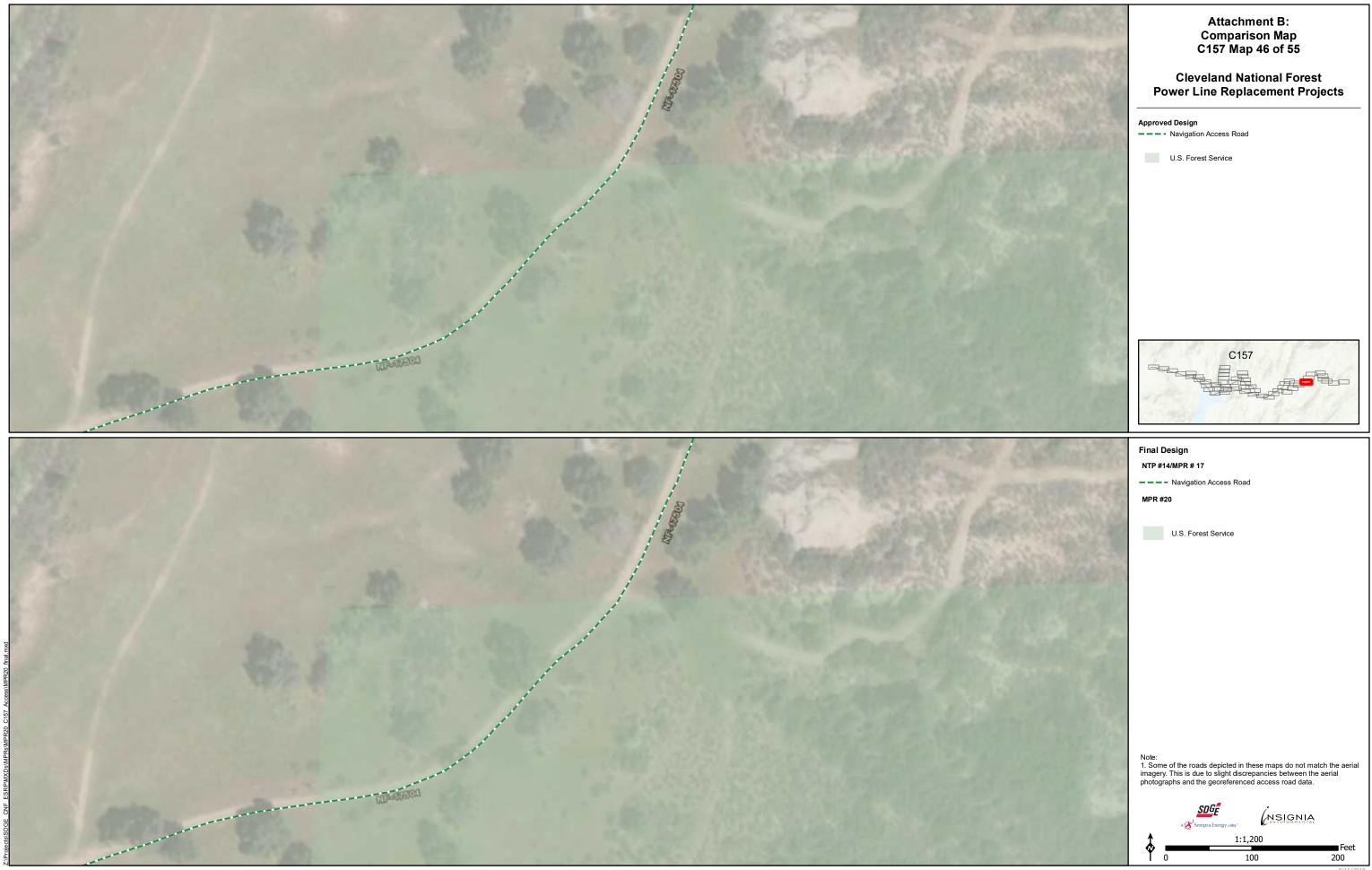


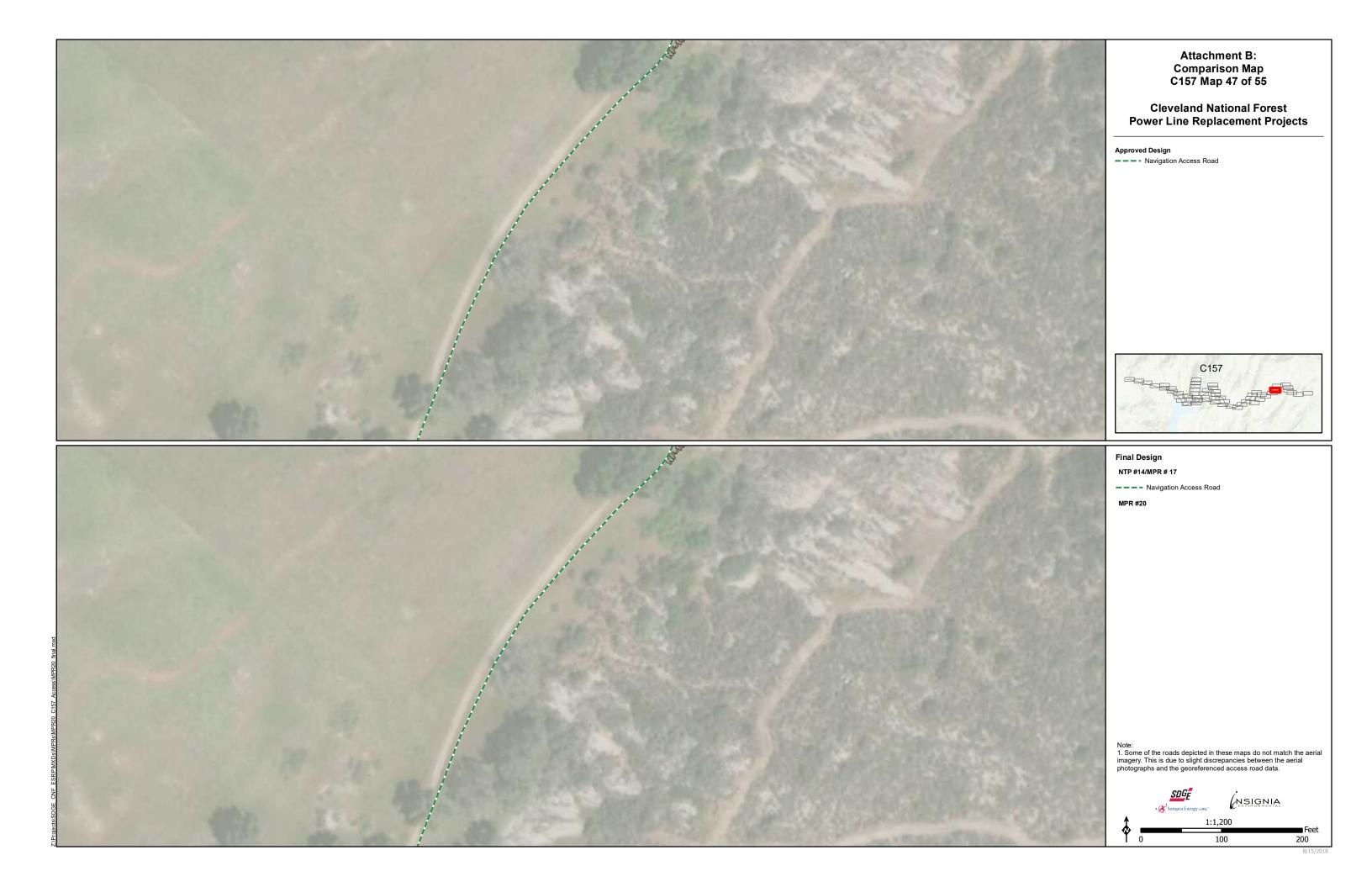


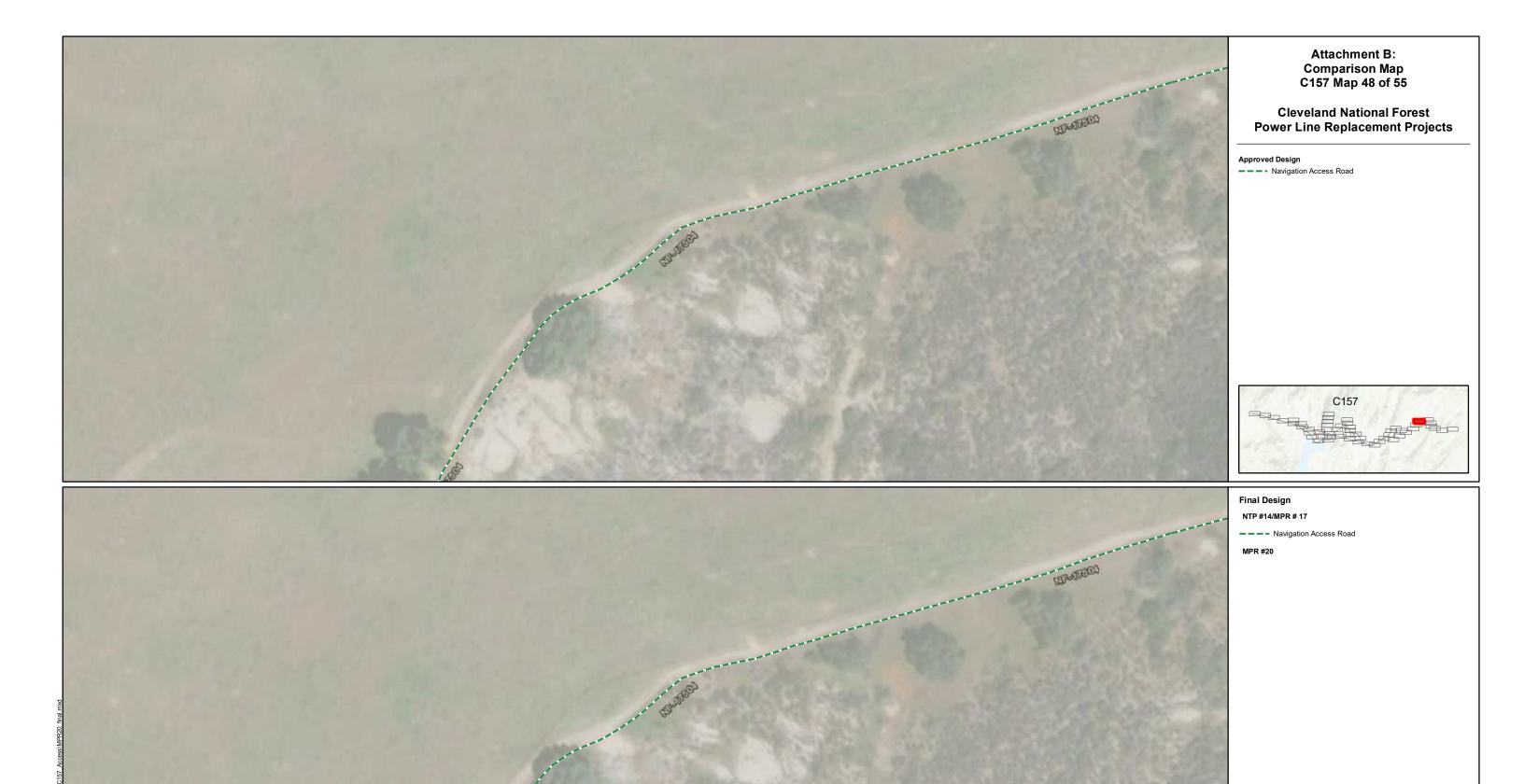












Note:

1. Some of the roads depicted in these maps do not match the aerial imagery. This is due to slight discrepancies between the aerial photographs and the georeferenced access road data.

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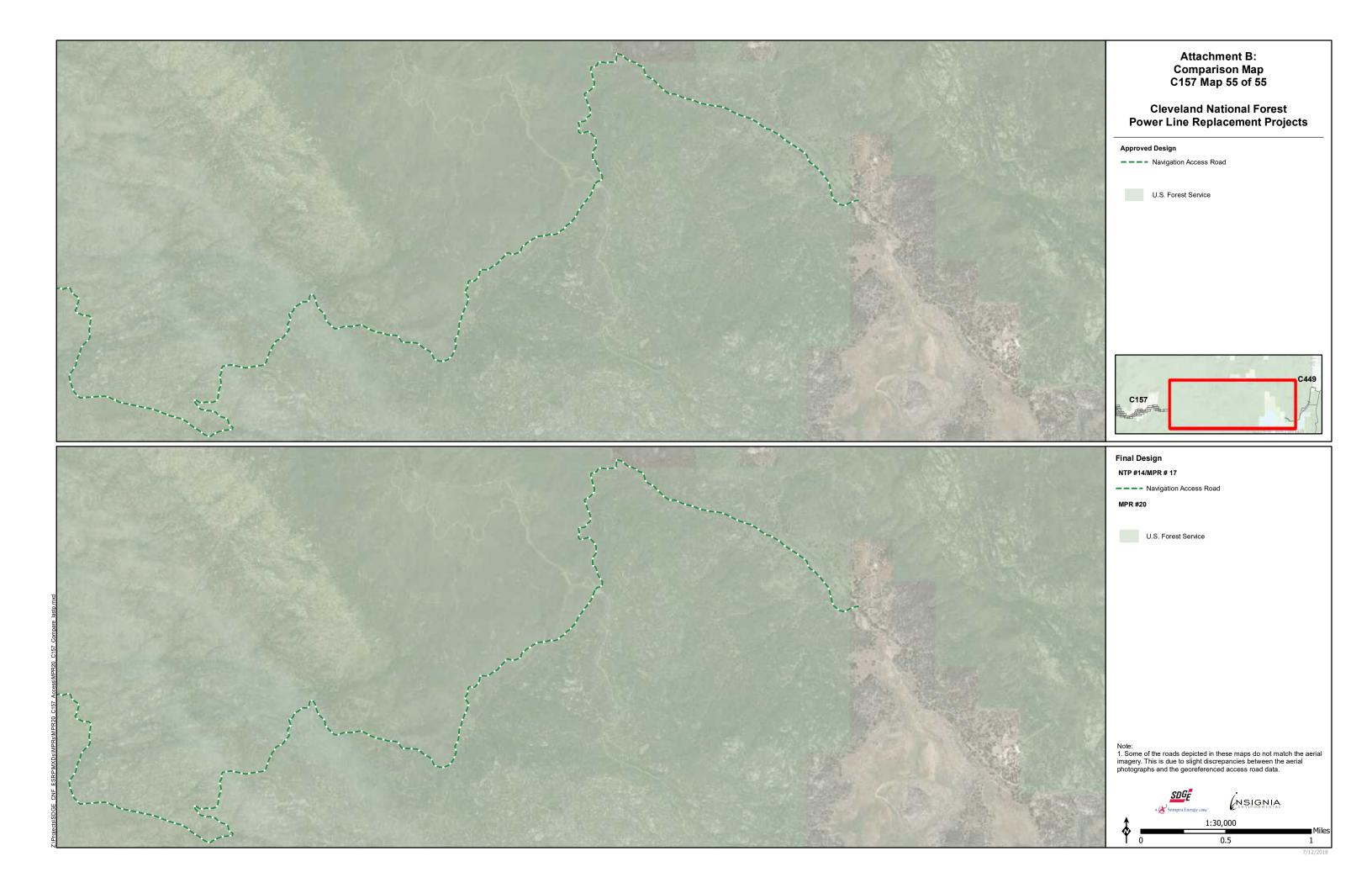












## ATTACHMENT C: IMPACTS TABLE

## ATTACHMENT C: IMPACTS TABLE

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

**Table 1: Impacts Table** 

	Approximate Impacts (acres)			
Temporary Impact Location	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground	
Access Roads <sup>2</sup>			0.53	
Pole Work Areas	0.03		<0.01	
Temporary Access/Entry/Turnaround	0.26		0.48	
MPR #20 Total	0.29	0.00	1.01	

<sup>&</sup>lt;sup>1</sup> A few of the refinements overlap with previously approved workspaces. Therefore, any area that overlaps is not included in the temporary totals.

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