

CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

A Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM

Date Submitted:	11-26-18		Request #:		024		
Date Approval Required:	12-10-18		Landowner:		United St (USFS)	tates Fores	st Service
APN:	XXX-XXX-XX						
Refinement from (check all that apply):							
☐ Mitigation Measure	\Box APM	⊠ Pro	ject Description		Drawing	\boxtimes	Other
Identify source (mitigation measure, project description, etc.):							
Notice to Proceed (NTP) requests #15 and #17 and Minor Project Refinement (MPR) requests #18 and #19 for Circuit (C) 449 and Transmission Line (TL) 629C of the Cleveland National Forest Power Line Replacement Projects (Project) were approved by the California Public Utilities Commission (CPUC) and USFS on August 30, 2018. Since the submittal of these NTPs and MPRs, San Diego Gas & Electric Company (SDG&E) has determined that a new construction-only access road is required for construction on C449 and TL629C. A brief description and justification of the refinement is provided on page 2 of this MPR request.							
Attachments (check all that	t apply):						
⊠ Refinement Request Screening Form (See Attachment A: Minor □ Photos Project Refinement Request Comparison Map) Screening Form) □					□ Other		
Line Replacement Projects	Under Order 2 of the Decision Granting SDG&E Permit to Construct the Cleveland National Forest Power Line Replacement Projects (D.16-05-038), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 2 of the Decision, respond "yes" or "no" to the following questions (a) through (d).						
(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area? The requested refinement is located within the geographic boundary of the Final Environmental Impact Review/Environmental Impact Statement (EIR/EIS) study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. The refinement area occurs partially within the baseline biological and cultural survey areas, but outside of the baseline hydrological survey area. As a result, supplemental hydrological, biological, and cultural resources surveys were conducted in 2018. Additional details regarding the specific surveys conducted are provided in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form.				□ Yes	⊠ No		
(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?					□ Yes	🖾 No	
(c) Does the proposed refine or policy?	ement conflict with an	y mitiga	tion measure or ap	plicab	le law	□ Yes	🛛 No
(d) Does the proposed refin	ement trigger an addi	tional pe	ermit requirement?	•		□ Yes	🖾 No

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

As depicted in Attachment B: Comparison Map, SDG&E is requesting to add approximately 930 feet of construction-only access road south of Poles Z100049 and Z100050. In addition, SDG&E will no longer use approximately 273 feet of construction-only access road northwest of Pole Z100050 that was approved in NTP requests #15 and #17. The requested construction-only access road will follow the Pacific Crest National Scenic Trail (PCT) for the entirety of the road's length. It will be hand-brushed, as necessary, to a width of approximately 12 feet, and may be brushed slightly wider at turns to allow for vehicle and equipment access. The PCT will be restored to its original width once construction is complete. An approximately 70-foot-long segment of the requested construction-only access road may require the placement of fill material depending on the access conditions at the time of construction (i.e., if future erosion occurs); however, no grading will be required. Use of the construction-only access road will result in an increase of approximately 0.18 acre of temporary impacts (of which approximately 0.08 acre is classified as native vegetation). The activities associated with the construction and utilization of the road will occur in the same manner as described in the Final EIR/EIS for construction of the Project.

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

SDG&E is requesting to add the construction-only access road south of Poles Z100049 and Z100050 in order to provide vehicle and equipment access to Stringing Site (SS-) 01 on C449 and SS-06 and SS-07 on TL629C, as well as to avoid use of the construction-only access road northwest of Pole Z100050. The previously approved construction-only access road northwest of Pole Z100050 is located within a cultural site, and no grading or ground disturbance is allowed. Due to existing conditions (i.e., an eroded channel), use of the road is not possible without significant improvements that would require ground disturbance and large amounts of fill for stabilization and road repair. It has been determined that truckloads of fill would have to be brought in and compacted with rubber-wheeled vehicles. Given the condition of the previously approved construction-only access road and the cultural resource restrictions,¹ the fill would have to be left on site, which potentially introduces long-term stabilization and erosion concerns. Therefore, the requested construction-only access road will allow vehicle and equipment access, avoid impacts to a known cultural site, reduce road improvement efforts, and eliminate potential future erosion issues downslope from the previously approved work areas. SDG&E has determined that the requested refinement will be less impactful to resources and the safest route to access SS-01 on C449 and SS-06 and SS-07 on TL629C.

Date refinement is expected to be implemented: 12-11-18

Resource Agency Coordination

Resource Agency	Name	Action Required	Date	Documentation (see attached if yes)	
Not Applicable (N/A)	N/A	N/A	N/A	□ Yes	□ No

¹ The cultural resource restrictions are described in Section 3.1.3.1 of the Historic Properties Management Plan and the Appendix A updates for NTP requests #15 and #17. These restrictions prohibit grading within a mapped cultural site boundary.

ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

RESOURCE EVALUATION

The requested refinement was evaluated to verify that it will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest Power Line Replacement Projects (Project). The following Final EIR/EIS Consistency Checklist answers the consistency questions for each resource category and includes a description and justification below each resource category, as necessary. The consistency questions were developed using the California Environmental Quality Act Checklist provided in the Final EIR/EIS. Refer to the Final EIR/EIS for details on the Project's impact evaluation.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Visual Resources (e.g., adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character of the site and its surroundings, create sources of light or glare, or result in an inconsistency with applicable scenic integrity objectives)? <i>Final EIR/EIS evaluation²: Significant and unavoidable (Class I)/Adverse and unavoidable</i>			

Summary of Proposed Minor Project Refinement Impacts on Visual Resources:

The requested refinement will be consistent with the visual resource analysis defined in the Final EIR/EIS, and it will not impact scenic vistas or substantially affect existing views from Eligible State Scenic Highways (i.e., Interstate 8) and County of San Diego Scenic Routes (i.e., Old Highway 80). Impacts to the visual character of the area may occur as a result of brushing; however, these potential impacts will be reduced with implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. Therefore, the requested refinement 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)?	\boxtimes	
Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable		

Summary of Proposed Minor Project Refinement Impacts on Air Quality:

Activities associated with construction and utilization of the requested refinement area (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 area is not located within 1,000 feet of sensitive receptors; therefore, the additional brushing, potential fill, and dust will not expose adjacent sensitive receptors to substantial pollutant concentrations. In addition, there will be a negligible increase in air quality impacts within the localized area because these activities are short-term, temporary, and only cover a small area. With the implementation of APM AIR-01 through APM AIR-05, use of the refinement area will be consistent with the analysis in the Final EIR/EIS. Therefore, the requested refinement 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.

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

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation</i> (<i>Class II</i>)/Adverse			

Summary of Proposed Minor Project Refinement Impacts on Biological Resources:

The requested refinement area was partially surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial surveys that were conducted for the Project. Therefore, a supplemental biological resource survey of the refinement area was conducted in 2018. No special-status plant or wildlife species or other biological resource issues were identified within or adjacent to the refinement area that were not previously analyzed in the Final EIR/EIS.

The requested refinement will result in an increase of approximately 0.10 acre of temporary impacts to bare ground, which falls in the Agricultural/Disturbed/Developed/Bare Ground impact category for SDG&E's Subregional Natural Community Conservation Plan (NCCP), and 0.08 acre of chamise chaparral, which falls in the Native Vegetation impact category for SDG&E's Subregional NCCP. Temporary impacts of approximately 0.18 acre will occur to United States (U.S.) Fish and Wildlife Service-designated critical habitat for arroyo toad (*Anaxyrus californicus*) and U.S. Forest Service (USFS) occupied habitat for arroyo toad.³ This species was analyzed in the Final EIR/EIS; and all APMs and mitigation measures (MMs) defined in the Project's Mitigation Monitoring, Compliance, and Reporting Program—as well as other permit and plan conditions—will be implemented as applicable to minimize or mitigate any additional impacts. Thus, the requested refinement 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.

³ Impacts from the construction-only access road that will no longer be used have been subtracted from the temporary impact totals for vegetation and critical and occupied habitat.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
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)?	\boxtimes		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

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

The requested refinement area is located within the Project's area of potential effect, as defined in the Project's Programmatic Agreement. The refinement area was partially surveyed for cultural resources during initial surveys that were conducted for the Project in 2011 and during surveys that were conducted in 2017 in support of Notice to Proceed request #15. A supplemental intensive pedestrian survey of the remaining portion of the refinement area was conducted by ASM Affiliates, Inc. in 2018. No new cultural resources were recorded during the supplemental survey. One previously recorded cultural resource was identified during the supplemental survey within the refinement area. Environmentally sensitive area fencing will be used to protect the cultural resource within the refinement area, which will avoid significant impacts to this resource. Further details on this cultural resource are included in a supplemental confidential cultural resources letter report, which will be submitted to the USFS in support of this Minor Project Refinement (MPR) request.

The requested refinement area follows a segment of the Pacific Crest National Scenic Trail (PCT) that has the potential to be recommended eligible for the National Register of Historic Places once it hits the 50-year mark; however, this section of the PCT does not yet qualify as a historic resource. In addition, temporary use of the PCT for construction will not have a significant impact on the trail. Therefore, the requested refinement will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to cultural resources as defined in the Final EIR/EIS.

The requested refinement is underlain by geologic rock units/formations assigned a rank of Potential Fossil Yield Classification (PFYC) Class 1 (very low sensitivity). Because the refinement does not require pole installation in areas 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 refinement 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)? <i>Final EIR/EIS evaluation: Less than significant (Class III)/Not advance</i>		
adverse		

Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:

Activities associated with construction and utilization of the requested refinement area are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Furthermore, additional brushing will not trigger an exceedance of the GHG threshold of 10,000 metric tons of carbon dioxide equivalent per year or the County of San Diego Climate Action Plan criteria for annual grading and land clearing. Therefore, the requested refinement 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	N/A
Public Health and Safety (e.g., result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials; emit hazardous waste within one-quarter mile of a school; be located on a hazardous materials site; result in a safety hazard for people residing or working in the Project area; interfere with an adopted emergency plan; or create safety hazards due to structural failure)? <i>Final EIR/EIS evaluation: Less than significant with mitigation</i> (<i>Class II</i>)/Adverse	X		

Summary of Proposed Minor Project Refinement Impacts on Public Health and Safety:

The requested refinement occurs within the area assessed in the *Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California.* No known hazardous materials sites are located in the refinement area. Therefore, the requested refinement will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public health and safety as identified in the Final EIR/EIS.

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

The requested refinement will be located within the 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 area will be managed in compliance with the Project's Construction Fire Prevention/Protection Plan. Therefore, the requested refinement will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to fire and fuels management as identified in the Final EIR/EIS.

Hydrology and Water Quality (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)? <i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i> <i>I)/Adverse and unavoidable</i>			
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Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:

The requested refinement area was not surveyed for the presence of waters of the state and/or the U.S. (i.e., jurisdictional wetlands or non-wetland waters) during initial surveys that were conducted for the Project. Therefore, a supplemental water resource survey of the refinement area was conducted in 2018. The requested refinement area does not contain any waters of the state under the jurisdiction of the California Department of Fish and Wildlife or Regional Water Quality Control Board, or waters or the U.S. under the jurisdiction of the U.S. Army Corps of Engineers. To minimize potential impacts from erosion and off-site sedimentation during construction, the Storm Water Pollution Prevention Plan for Circuit (C) 440, C442, C449, Transmission Line (TL) 629C, and TL6958 (Waste Discharge Identification No. 9 37C381630) will be updated with the refinement area upon approval of this request. Therefore, the requested refinement 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.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
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 C449 and TL629C were notified of construction activities on June 20, 2018 and July 26, 2018, respectively, and the property owners within 1,000 feet of the requested refinement were included in that notification process. The requested refinement 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 refinement will not conflict with the applicable land use plans, policies, or regulations of an agency with jurisdiction over the Project, as it is located in the same County of San Diego land use and zoning designations and Cleveland National Forest Land Management Plan land use zone that were analyzed in the Final EIR/EIS. The USFS will provide formal communication that allows SDG&E's temporary use of the PCT as a construction-only access road. A description of how access to the PCT will be maintained during construction is included in the Recreation section of this MPR request. In conclusion, the requested refinement will not result in new significant impacts or a substantial increase in the severity of a previously analyzed impact to land use as identified in the Final EIR/EIS.

Noise (e.g., disturb sensitive receptors and violate local rules,
standards, and/or ordinances; or cause ground borne vibration)?
Final EIR/EIS evaluation: Less than significant with mitigation
(Class II)/AdverseImage: Image: Image

Summary of Proposed Minor Project Refinement Impacts on Noise:

Additional construction-related noise will be generated within the requested refinement area due to brushing and large equipment operation. The refinement area is not located within 1,000 feet of sensitive receptors; therefore, temporary increases in noise levels will not disturb sensitive receptors. With the implementation of noise-related MMs and APMs, noise impacts from construction activities associated with the refinement area will be the same as those analyzed in the Final EIR/EIS. Therefore, the requested refinement will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to noise as identified in the Final EIR/EIS.

Public Services and Utilities (e.g., result in construction of new, or expansion of existing, facilities for fire protection, municipal water supplies, telecommunications, and solid waste; or disrupt electric service)?	\boxtimes	
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

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

The requested refinement will be consistent with the public services and utilities analysis in the Final EIR/EIS, and will not require new or expanded facilities or services. Therefore, the requested refinement will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public services and utilities as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist				
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A	
Recreation (e.g., reduce access and visitation to recreation areas, preclude recreational activities, or result in increased, unauthorized access to specially designated or restricted areas)?	\boxtimes			
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse				

Summary of Proposed Minor Project Refinement Impacts on Recreation:

The requested refinement area will be located adjacent to the C449 and TL629C alignments analyzed in the Final EIR/EIS. The refinement area will also be located near the Boulder Oaks Campground and the proposed La Posta Creek/Old Highway 80 Pathway, and will follow the PCT for the length of the refinement area. During temporary use of the refinement area (i.e., periods of initial brushing, vehicle access, stringing operations, etc.), traffic/safety controls (e.g., flaggers) will be established to maintain use of and access to the PCT during construction. In addition, there will be safety checkpoints and a "hold and release" process⁴ when necessary for public safety. Therefore, consistent with the analysis in the Final EIR/EIS, use of the refinement area, or increase the possibility of unauthorized access to specially designated or restricted areas. Therefore, the requested refinement will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to recreation as identified in the Final EIR/EIS.

Transportation and Traffic (e.g., conflict with an applicable congestion management program or a plan, ordinance, or policy associated with the circulation system or alternative transportation; increase hazards due to a design feature; or result in inadequate emergency access)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>			
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Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:

The requested refinement 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 use of the refinement will affect the same roadways analyzed in the Final EIR/EIS (e.g., Old Highway 80), as well as some USFS roads. With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to the existing levels of service (LOS)⁵ will be adequately addressed. Therefore, the requested refinement 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.

⁴ During the "hold and release" process, hikers will be stopped for short durations at safety checkpoints during construction activities until it is safe to proceed along the PCT.

⁵ Old Highway 80 has an LOS of A through D; and an LOS does not exist for USFS roads.

ATTACHMENT B: COMPARISON MAP

