



## CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS



### MINOR PROJECT REFINEMENT REQUEST FORM

<b>Date Submitted:</b>	03-29-19	<b>Request #:</b>	030
<b>Date Approval Required:</b>	04-12-19	<b>Landowner:</b>	XXXX
<b>APN:</b>	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 type="checkbox"/> Drawing <span style="margin-left: 20px;"><input checked="" type="checkbox"/> Other</span>
<b>Identify source (mitigation measure, project description, etc.):</b>			
<p>Notice to Proceed (NTP) request #15 and Minor Project Refinement (MPR) request #18 for the Cleveland National Forest Power Line Replacement Projects (Project) were approved by the California Public Utilities Commission (CPUC) and the United States Forest Service on August 30, 2018. Since the approval of NTP request #15 and MPR request #18, San Diego Gas &amp; Electric Company (SDG&amp;E) has determined that a modification to the approved navigation access road to Pole P45476 is required in order to minimize impacts to sensitive resources and maintain conventional access to Pole P45476. A brief description and a justification of the refinement are provided on page 2 of this MPR request.</p>			
<b>Attachments (check all that apply):</b>			
<input checked="" type="checkbox"/> Refinement Request Screening Form (See Attachment A: Minor Project Refinement Request Screening Form)	<input checked="" type="checkbox"/> Maps (See Attachment B: Comparison Map)	<input checked="" type="checkbox"/> Photos (See Attachment C: Photographs)	<input type="checkbox"/> Other
<p><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></p>			
<p><b>(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area?</b></p> <p>The requested refinement is 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. In addition, the refinement area occurs within the baseline biological and cultural survey areas, and partially within the baseline hydrological survey area. Supplemental hydrological, biological, and cultural resources surveys were conducted in 2017, 2018, and 2019. Additional details regarding the specific surveys conducted can be found in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p><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></p> <p>Discussion of changes in significant impacts due to the requested refinement is based on criteria used in the Final EIR/EIS and is resource area-specific. The changes to each resource area are fully analyzed in Attachment A: Minor Project Refinement Request Screening Form.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p><b>(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?</b></p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

<b>(d) Does the proposed refinement trigger an additional permit requirement?</b>				<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No			
<b>Describe refinement being requested (attach drawings and photos as needed):</b>									
As depicted in Attachment B: Comparison Map and Attachment C: Photographs, SDG&E is requesting to modify the previously approved navigation access road to Pole P45476, which is an overland travel route. The modified road will begin approximately 65 feet southeast of Pole P45759 at an existing chain-link gate, then continue south for approximately 20 feet before turning east for approximately 150 feet, paralleling an existing fence line. The road will then continue south for approximately 95 feet to the temporary pole work area for Pole P45476. No vegetation clearing or grading (i.e., ground disturbance) is required for use of the modified road; however, trimming of vegetation may be required for fire mitigation. The activities associated with the modified navigation access road will occur in the same manner as described in the Final EIR/EIS for construction of the Project.									
<b>Provide need for refinement (attach drawings and photos as needed):</b>									
SDG&E is requesting to modify the navigation access road to Pole P45476 in order to minimize impacts to sensitive cultural resources that were discovered within 50 feet of the approved navigation access road, as well as maintain conventional access to Pole P45476 for pole and anchor hole digging and pole setting.									
<b>Date refinement is expected to be implemented:</b>				04-13-19					
<b>Resource Agency Coordination</b>									
<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: 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, 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.

<b>Final EIR/EIS Consistency Checklist</b>			
<b>Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:</b>	<b>No Change</b>	<b>Potentially Significant Change</b>	<b>Not Applicable</b>
<p><b>Visual Resources</b> (e.g., adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character of the site and its surroundings, create sources of light or glare, or result in an inconsistency with applicable scenic integrity objectives)?</p> <p><i>Final EIR/EIS evaluation<sup>1</sup>: Significant and unavoidable (Class I)/Adverse and unavoidable</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Summary of Proposed Minor Project Refinement Impacts on Visual Resources:</b></p> <p>Modifying the location of the requested refinement will not result in additional impacts to visual resources because no ground disturbance will occur and the alteration in location is minor. In addition, the requested refinement will be consistent with the visual resource analysis as defined 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 visual resources as identified in the Final EIR/EIS.</p>			
<p><b>Air Quality</b> (e.g., produce additional emissions, conflict with applicable local air quality plans, or expose sensitive receptors to additional pollutants)?</p> <p><i>Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Summary of Proposed Minor Project Refinement Impacts on Air Quality:</b></p> <p>Activities associated with the 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. In addition, the requested refinement will not require vegetation clearing or grading (i.e., ground disturbance). Therefore, with the implementation of air-related APMs, 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.</p>			

<sup>1</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.

**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
<p><b>Biological Resources</b> (e.g., result in temporary or permanent loss of native vegetation, preserve areas, native wildlife and/or their habitats; cause an adverse effect to jurisdictional waters or sensitive or special-status species; result in the introduction of invasive, non-native, or noxious plant species; conflict with local, regional, or state habitat conservation plan; or interfere with the movement of any resident or migratory wildlife)?</p> <p><i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Biological Resources:</b></p> <p>The requested refinement area was previously surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial Project surveys. In addition, supplemental surveys of the refinement area were conducted in 2018 and 2019 to verify site conditions. 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.</p> <p>Jacumba milkvetch (<i>Astragalus douglasii</i> var. <i>perstrictus</i>), which is a special-status plant, is located adjacent to the requested refinement area. Impacts to this plant will be avoided to the maximum extent possible by installing fencing or flagging near known locations.<sup>2</sup> The requested refinement area is located within United States (U.S.) Fish and Wildlife Service-designated critical habitat and U.S. Forest Service occupied habitat for arroyo toad (<i>Anaxyrus californicus</i>). 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 for any additional impacts. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final EIR/EIS.</p>			
<p><b>Cultural and Paleontological Resources</b> (e.g., cause an adverse change to Traditional Cultural Properties or historical, archeological, or paleontological resources; or disturb any human remains)?</p> <p><i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Cultural and Paleontological Resources:</b></p> <p>The requested refinement area was surveyed for cultural resources during initial Project surveys in 2011, and is located within the Project’s area of potential effect, as defined in the Project’s Programmatic Agreement. Supplemental intensive pedestrian surveys were conducted by ASM Affiliates, Inc. in 2017 and 2019 for Project components in the same vicinity. On February 19, 2019, one new cultural resource was identified within 50 feet of the previously approved navigation access road to Pole P45476 during 2019 surveys. As a result, SDG&amp;E is requesting to modify/shift the approved navigation access road to Pole P45476 to the north and east of the previously approved navigation access road to avoid the new resource. The recommendations for avoiding the resource at this location have been added as part of an Avoidable New Discovery (AND) notification, and include monitoring for any vegetation removal that may be required for fire mitigation and establishing and maintaining environmentally sensitive area fencing on the south portion of the modified navigation access road in order to secure the resource. The modified navigation access road was microsited to avoid the AND. It is also recommended that if the navigation access road will be utilized during wet weather conditions, protective matting</p>			

<sup>2</sup> Per the Project’s approved Special-Status Plant Species Salvage and Relocation Plan, no treatment is required for this plant species.

**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
<p>will be used to reduce vehicle tracking during ingress and egress to Pole P45476. Therefore, the requested refinement will not result in a new significant impact.</p> <p>The requested refinement is underlain by geologic rock units/formations assigned a rank of Potential Fossil Yield Classification (PFYC) Class 2 (low sensitivity). Because the refinement does not 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 &amp; 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.</p>			
<p><b>Greenhouse Gases</b> (e.g., result in a net increase of greenhouse gas emissions, or conflict with an applicable plan, policy, or regulation that reduces greenhouse gas emissions)?</p> <p><i>Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:</b></p> <p>Activities associated with utilization of the requested refinement area will be consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. As no vegetation clearing or grading is required, the requested refinement will not trigger an exceedance of the GHG threshold of 10,000 metric tons of carbon dioxide equivalent per year or an exceedance of 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.</p>			
<p><b>Public Health and Safety</b> (e.g., result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials; emit hazardous waste within one-quarter mile of a school; be located on a hazardous materials site; result in a safety hazard for people residing or working in the Project area; interfere with an adopted emergency plan; or create safety hazards due to structural failure)?</p> <p><i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Public Health and Safety:</b></p> <p>The requested refinement occurs within the area assessed in the <i>Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California</i>. No known hazardous materials sites are located in the requested 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.</p>			

<b>Final EIR/EIS Consistency Checklist</b>			
<b>Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:</b>	<b>No Change</b>	<b>Potentially Significant Change</b>	<b>Not Applicable</b>
<p><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)?</p> <p><i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Summary of Proposed Minor Project Refinement Impacts on Fire and Fuels Management:</b></p> <p>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.</p>			
<p><b>Hydrology and Water Quality</b> (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)?</p> <p><i>Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:</b></p> <p>The requested refinement area was surveyed for the presence of waters of the state and/or the U.S. (i.e., jurisdictional wetlands or non-wetland waters) during initial Project surveys. In addition, supplemental surveys of the refinement area were conducted in 2018 and 2019 to verify site conditions. The refinement area does not contain any waters of the state or U.S. Because no new ground disturbance will occur, an update to the Storm Water Pollution Prevention Plan for Circuit (C) 440, C442, C449, Transmission Line (TL) 629C, and TL6958 (Waste Discharge Identification #9 37C381630) is not 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 hydrology and water quality as identified in the Final EIR/EIS.</p>			
<p><b>Land Use</b> (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)?</p> <p><i>Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Summary of Proposed Minor Project Refinement Impacts on Land Use:</b></p> <p>In accordance with the Construction Notification Plan and MM LU-1, property owners within 1,000 feet of C449 were notified of construction activities on August 28, 2018, 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 they are located in the same County of San Diego land use and zoning designations that were analyzed in the Final EIR/EIS. Therefore, 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.</p>			



**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
<p><b>Noise</b> (e.g., disturb sensitive receptors and violate local rules, standards, and/or ordinances; or cause ground borne vibration)?  <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Noise:</b>                      Additional construction-related noise will be generated within the requested refinement area due to equipment and vehicle travel along the modified navigation access road. As a result, use of the refinement area may result in temporary increases in noise levels for the localized area; however, the activities within the refinement area will be short-term and temporary, and no additional sensitive receptors will be affected. With implementation of noise-related MMs and APMs, 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.</p>			
<p><b>Public Services and Utilities</b> (e.g., result in construction of new, or expansion of existing, facilities for fire protection, municipal water supplies, telecommunications, and solid waste; or disrupt electric service)?  <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Public Services and Utilities:</b>                      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.</p>			
<p><b>Recreation</b> (e.g., reduce access and visitation to recreation areas, preclude recreational activities, or result in increased, unauthorized access to specially designated or restricted areas)?  <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p><b>Summary of Proposed Minor Project Refinement Impacts on Recreation:</b>                      Like Notice to Proceed request #15, the requested refinement area will be located near the Pacific Crest National Scenic Trail and the proposed Buckman Springs Road Pathway. Use of the refinement area will not reduce or preclude access or visitation to these recreational areas, 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.</p>			

**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
<p><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)?</p> <p><i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:</b></p> <p>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., Buckman Springs Road). With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to the existing levels of service (LOS)<sup>3</sup> 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.</p>			

<sup>3</sup> Buckman Springs Road has an LOS of A through C.

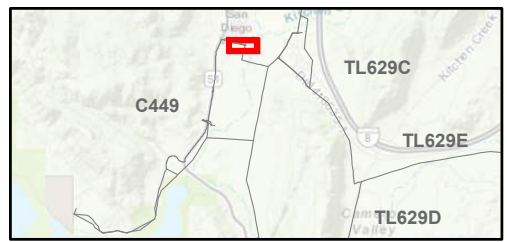
**ATTACHMENT B: COMPARISON MAP**



**Attachment B:  
Comparison Map  
C449 Map 1 of 1**

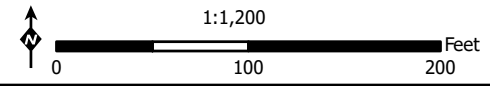
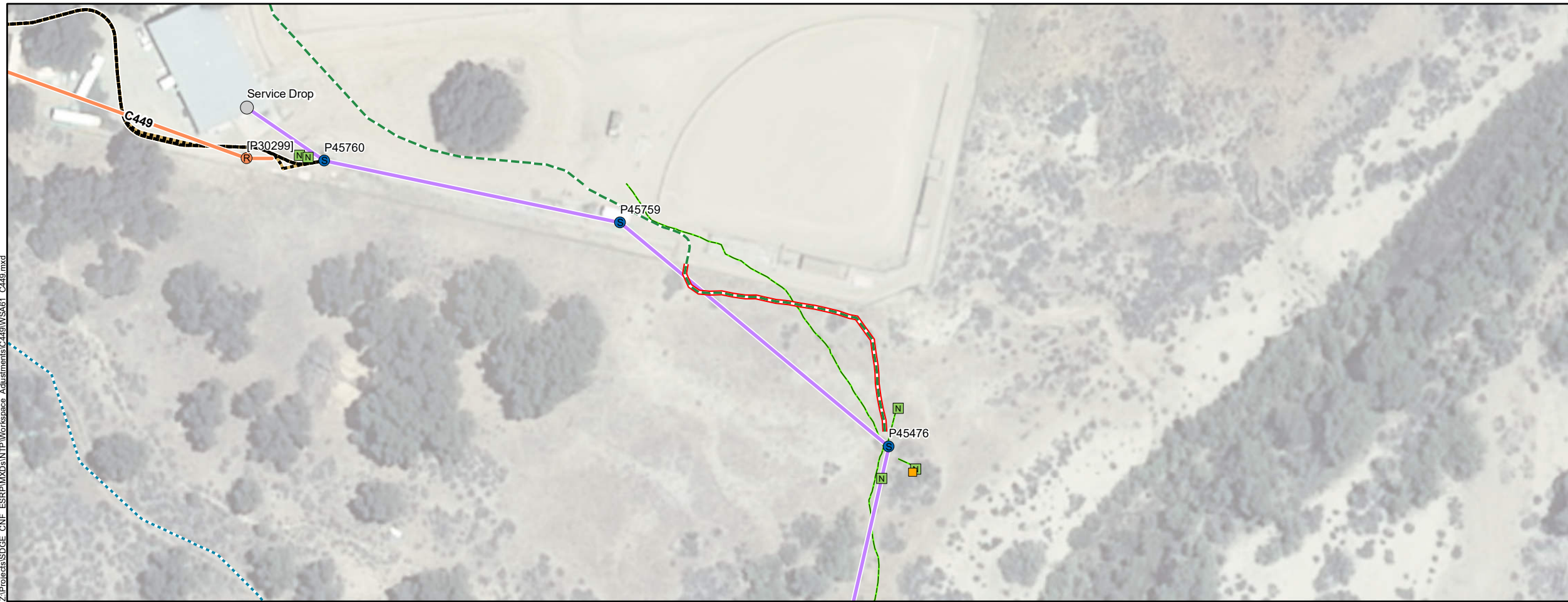
**Cleveland National Forest  
Power Line Replacement Projects**

- Approved Design**
- Pole Top Work Only
  - Ⓡ Removal
  - Ⓢ Wood-to-Steel Replacement 12kV Only
  - Ⓝ New Anchor
  - Ⓜ Remove From Service Anchor
  - Handhole
  - Transformer
  - Pad
  - Anchor Work Area
  - Stringing Site
  - Temporary Pole Work Area
  - Underground Work Limits
  - Construction-Only Access Road
  - Footpath
  - Navigation Access Road
  - 12 kV Removal
  - New Underground
  - Wood-to-Steel Replacement



- Final Design**
- NTP #15/MPR #18**
- Pole Top Work Only
  - Ⓡ Removal
  - Ⓢ Wood-to-Steel Replacement 12kV Only
  - Ⓝ New Anchor
  - Ⓜ Remove From Service Anchor
  - Construction-Only Access Road
  - Footpath
  - Navigation Access Road
  - New Underground
  - Wood-to-Steel Replacement

- MPR #30**
- Navigation Access Road



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**ATTACHMENT C: PHOTOGRAPHS**







Cleveland National Forest Power Line Replacement Projects  
Minor Project Refinement Request #30  
Attachment C: Photographs



**Photograph 1:**

A south-facing photograph of the requested modified navigation access road to Pole P45476. Pole P45476 is visible in the background.



**Photograph 2:**

A north-facing photograph of the requested modified navigation access to Pole P45476. The photograph was taken from within the approved temporary pole work area for Pole P45476.