

# CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM 08-25-20 (Revised 10-15-20) 048 **Date Submitted: Request #:** 10-21-20 XXX **Date Approval Required:** Landowner: APN: XXX-XXX-XX **Refinement from (check all that apply):** □ Mitigation Measure  $\Box$  APM Project Description  $\Box$  Drawing ⊠ Other Identify source (mitigation measure, project description, etc.): Notice to Proceed request #25 for Transmission Line (TL) 626 Conversion North and TL626RFS of the Cleveland National Forest Power Line Replacement Projects (Project) was approved by the California Public Utilities Commission (CPUC) on February 4, 2020 and by the United States Forest Service (USFS) on February 5, 2020. Due to the discovery of sensitive cultural resources during construction on TL626 Conversion North at the approved replacement pole location for Pole P259378 (Location 72) on March 13, 2020, the replacement pole location needs to be shifted to avoid these sensitive resources. This Minor Project Refinement (MPR) request integrates design considerations, such as the re-design of Pole P259378 to shift the replacement pole location approximately 130 feet south and specialized installation of grounding rods, to avoid sensitive resources that were discovered and minimize impacts to the known archaeological site at this location. This re-design was informed by multiple site visits, archaeological testing efforts, and conforms with the location and approach that has been agreed upon by SDG&E, USFS, and the consulting tribes. Additional information is also provided in the Cultural and Paleontological Resources section of Attachment A: Minor Project Refinement Request Screening Form and the Confidential Cultural Resources Letter Report prepared by ASM Affiliates, Inc. (ASM)<sup>1</sup> in support of this MPR request (submitted under separate cover). A description and justification of the refinement is provided on page 2 of this MPR request. Attachments (check all that apply): ⊠ Refinement Request Screening Form  $\boxtimes$  Maps (see Attachment A: Minor □ Photos (see Attachment B:  $\Box$  Other Project Refinement Request Comparison Map) Screening Form) 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 Report/Environmental Impact Study (EIR/EIS) study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. The refinement occurs within the  $\Box$  Yes 🖾 No baseline cultural survey area, partially within the biological survey area, and outside of the baseline hydrological survey area. Supplemental hydrological, biological, and cultural resources surveys were conducted in 2017, 2018, 2019, and 2020. Additional details regarding the specific surveys conducted are provided in each applicable resource section in Attachment A: Minor Project Refinement Request Screening Form.

<sup>&</sup>lt;sup>1</sup> Williams and Roland 2020.

| (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?<br>A 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.   |                         |            |                 |                 |      | □ Yes               | 🖾 No   |
|---|-------------------------|------------|-----------------|-----------------|------|---------------------|--|
| (c) Does the proposed refiner<br>or policy?   | nent conflict with any  | mitigation | measure         | or applicable l | aw   | □ Yes               | 🖾 No   |
| (d) Does the proposed refiner   | nent trigger an additie | onal permi | t requireı      | nent?           |      | □ Yes               | 🖾 No   |
| Describe refinement being re  | quested (attach drawi   | ngs and ph | otos as n       | eeded):         |      |                     |  |
| As depicted in Attachment B: Comparison Map, San Diego Gas & Electric Company (SDG&E) is requesting to shift the replacement pole for Pole P259378 (Location 72) approximately 130 feet south and add a temporary pole work area at this location. Vegetation removal will be required for use of the refinement area. The requested refinement will result in an increase of approximately 0.04 acre of temporary impacts. The new temporary pole work area will be accessed via a footpath. The previously approved temporary pole work area for Pole P259378 will be used to remove the existing wood pole and perform the wire transfer. <sup>2</sup> Excluding specialized installation of grounding rods, which is discussed further in the Cultural and Paleontological Resources section, the activities associated with the construction and utilization of the refinement area will occur in the same manner as described in the Final EIR/EIS for construction of the Project. |                         |            |                 |                 |      |                     | cy pole<br>ed<br>pole<br>9378<br>ation of<br>ies |
| Provide need for refinement (attach drawings and photos as needed):   |                         |            |                 |                 |      |                     |  |
| Following the discovery of sensitive cultural resources at Pole P259378 (Location 72) on March 13, 2020, a Notice of Discoveries for this location was sent out by the USFS to the Consulting Parties to the Project's Programmatic Agreement on May 6, 2020. Archaeological monitors from ASM and Native American Monitors were onsite during the discoveries. Following the Notice of Discoveries for this location, the Iipay Nation of Santa Ysabel was designated as the Most Likely Descendent (MLD) by the Kumeyaay Cultural Repatriation Committee. Through consultation with the MLD, it was requested that SDG&E review engineering options to avoid the resources discovered at this location. Details of the consultation process and final pole location can be found in the Confidential Cultural Resources Letter Report (Williams and Roland 2020).   |                         |            |                 |                 |      |                     | matic<br>te during<br>ough                       |
| Date refinement is expected t   | o be implemented:       | 10-22-20   |                 |                 |      |                     |  |
| Resource Agency Coordinati  | on                      |            |                 |                 |      |                     |  |
| <b>Resource Agency</b>  | Name                    |            | ction<br>quired | Date            |      | ocument<br>attached |  |
| Not Applicable (N/A)  | N/A                     | 1          | N/A             | N/A             | □ Ye | s 🗵                 | ] No   |

 $<sup>^{2}</sup>$  The 69 kilovolt (kV) wire will be removed from the existing wood pole and the 12 kV wire will be transferred from the existing wood pole to the replacement steel pole.

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 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<br>Significant<br>Change | N/A |
| <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)?<br><i>Final EIR/EIS evaluation<sup>3</sup>: Significant and unavoidable (Class I)/Adverse and unavoidable</i> |           |                                      |     |

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

Shifting the replacement pole for Pole P259378 (Location 72) will not substantially increase impacts to visual resources as the pole will be located within the existing right-of-way. The addition of a temporary pole work area may impact the visual character of the surrounding area due to vegetation removal; however, temporary impacts will be reduced with the implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02. In addition, the requested refinement will be consistent with the visual resource analysis defined in the Final EIR/EIS and will not impact scenic vistas<sup>4</sup> or substantially affect existing views from eligible State Scenic Highways or County of San Diego Scenic Routes. 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.

<sup>&</sup>lt;sup>3</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.

<sup>&</sup>lt;sup>4</sup> The scenic vista at the Inaja Memorial National Recreation Trail is located more than five miles from the refinement.

| Final EIR/EIS Consistency Checklist  |           |                                      |     |
|--|-----------|--------------------------------------|-----|
| Would the proposed action(s) result in a new impact, or<br>increase the severity of a previously analyzed impact to:   | No Change | Potentially<br>Significant<br>Change | N/A |
| Air Quality (e.g. produce additional emissions, conflict with<br>applicable local air quality plans, or expose sensitive receptors<br>to additional pollutants)?<br><i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i><br><i>I)/Adverse and unavoidable</i> |           |                                      |     |

### Summary of Proposed Minor Project Refinement Impacts on Air Quality:

Activities associated with 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 located within 1,000 feet of a sensitive receptor. Potential air quality impacts to sensitive receptors within 1,000 feet of Project components were analyzed in the Final EIR/EIS. The additional vegetation removal required for use of the refinement area may result in a minor increase in air quality impacts in the localized area; however, this activity will be short-term and temporary. With the implementation of APM AIR-01 through APM AIR-05, use of the refinement area will not expose the nearby sensitive receptor to substantial pollutant concentrations, which is 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.

**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:

The requested refinement area was partially surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial Project surveys. Supplemental surveys conducted in 2018, 2019, and 2020 along Transmission Line (TL) 626 Conversion North included a bat roost assessment, focused surveys for Townsend's big-eared bat (*Corynorhinus townsendii*) and other special-status bat species, focused surveys for special-status plants, and site verification surveys.

The requested refinement will result in a total of approximately 0.04 acre of temporary impacts to mixed oak woodland.<sup>5</sup> No special-status plants, special-status butterfly host plants, United States (U.S.) Fish and Wildlife Service-designated critical habitat, or U.S. Forest Service (USFS) occupied habitat occur within or adjacent to the requested refinement. 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 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.

<sup>&</sup>lt;sup>5</sup> Mixed oak woodland falls in the Native Vegetation impact category for SDG&E's Subregional Natural Community Conservation Plan.

| Final EIR/EIS Consistency Checklist  |             |                                      |     |
|--|-------------|--------------------------------------|-----|
| Would the proposed action(s) result in a new impact, or<br>increase the severity of a previously analyzed impact to:   | No Change   | Potentially<br>Significant<br>Change | N/A |
| <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)? | $\boxtimes$ |                                      |     |
| 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 occurs within the Project's area of potential effect, as defined in the Project's Programmatic Agreement. The refinement area was surveyed for cultural resources during initial surveys for the Project in 2009. In addition, intensive supplemental pedestrian surveys of the refinement area were conducted by ASM Affiliates, Inc. in 2019 and 2020. New cultural resource components associated with previously recorded cultural resources were identified during discovery and testing procedures, as outlined in the Project's Historic Properties Management Plan (Hector and Williams 2016). The details of the discoveries and subsequent testing activities and resolution are outlined in the Confidential Cultural Resources Letter Report (Williams and Roland 2020).

In order to avoid impacts to the possible human remains at the location of the discovery, and to reduce and minimize impacts to sensitive cultural resources in the area, ESA fencing is recommended to be installed around the new temporary pole work area for Pole P259378. Additionally, recommendations include no grading or grubbing and hand removal of vegetation only. Helicopter and footpath access is recommended to avoid impacts to site. An archaeological and Native American monitor will lead excavations, and full-time archaeological and cultural monitoring is recommended during any ground-disturbing activities. Pole Z213661 will be cut at ground and left in place to avoid impacts to resources present at the old pole location. One grounding rod will be installed in the existing pole hole and no trench will be required. If a second grounding rod is needed, it will be installed in a small groove with hand tools approximately six feet from the pole hole. With these recommendations, 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 identified in the Final EIR/EIS.

The requested refinement area is underlain by geologic rock units/formations assigned a rank of Potential Fossil Yield Classification (PFYC) Class 1 (i.e., very low sensitivity). Because the refinement does not require excavation underlain by rock units with a PFYC Class 3 (i.e., moderate or unknown sensitivity) ranking, additional paleontological monitoring and an update to the Paleontological Monitoring & Treatment Plan will not be required. Therefore, the requested 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.

| Final EIR/EIS Consistency Checklist   |           |                                      |     |
|---|-----------|--------------------------------------|-----|
| Would the proposed action(s) result in a new impact, or<br>increase the severity of a previously analyzed impact to:  | No Change | Potentially<br>Significant<br>Change | N/A |
| <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)?<br><i>Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse</i> |           |                                      |     |

### Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:

Activities associated with the utilization of the requested refinement area are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional vegetation removal will occur, this activity 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.

| <b>Public Health and Safety</b> (e.g., result in a significant hazard to<br>the public or the environment through the transport, use, or<br>disposal of hazardous materials; emit hazardous waste within<br>one-quarter mile of a school; be located on a hazardous materials<br>site; result in a safety hazard for people residing or working in the<br>Project area; interfere with an adopted emergency plan; or create<br>safety hazards due to structural failure)?<br><i>Final EIR/EIS evaluation: Less than significant with mitigation</i> |  |  |
|---|--|--|
| (Class II)/Adverse  |  |  |

### 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 within 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.

| <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)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)</i> <sup>(Advarse)</sup> |  |  |
|---|--|--|
| (Class II)/Adverse  |  |  |

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

The requested refinement is located within the Very High Fire Hazard Severity Zone, which was included in 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.

| 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<br>Significant<br>Change | N/A |
| <b>Hydrology and Water Quality</b> (e.g., result in increased levels<br>of turbidity, introduce contaminants, deplete groundwater<br>supplies, or degrade water quality)?<br><i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i><br><i>I)/Adverse and unavoidable</i> |           |                                      |     |

#### 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 Project surveys. Supplemental water resource surveys of the refinement area were conducted in 2018 and 2020. The requested refinement does not contain any waters of the state or the U.S.; therefore, no jurisdictional water permitting will be required. To minimize potential impacts from erosion and off-site sedimentation during construction, the refinement area will be included in a Change of Information for the Circuit (C) 79A, TL625C, TL626, and TL629A Storm Water Pollution Prevention Plan (Waste Discharge Identification #9 37C386349) and submitted to the State Water Resources (i.e., straw wattles) will be staked to the ground, and no trenching or rock bags will be utilized. In conclusion, 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.

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

#### 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 TL626 Conversion North and TL626RFS were notified of construction activities associated with Notice to Proceed #25 on December 23, 2019, and some property owners were re-noticed on March 19, 2020. The property owners within 1,000 feet of the requested refinement were included in these notification processes. 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 the refinement is 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.

| Would the proposed action(s) result in a new impact, or<br>increase the severity of a previously analyzed impact to:  | No Change   | Potentially<br>Significant<br>Change   | N/A   |
|---|---|--|---|
| <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>  |   |  |   |
| Summary of Proposed Minor Project Refinement Impacts of<br>Construction-related noise will be generated within the requester<br>work, and large equipment operation. The refinement area is low<br>Potential noise impacts to sensitive receptors within 1,000 feet of<br>EIR/EIS. Use of the refinement area may result in temporary in<br>activities will be short-term and temporary. In addition, with im<br>noise impacts from construction activities associated with the re<br>in the Final EIR/EIS. Therefore, the requested refinement will r<br>substantial increase in the severity of a previously analyzed imp | d refinement area<br>cated within 1,000<br>f Project compone<br>creases in noise le<br>plementation of n<br>finement area will<br>tot result in a new | feet of a sensitivents were analyzed<br>vels; however, thoise-related MM<br>be equivalent to<br>significant impa | ve receptor.<br>ed in the Final<br>ne construction<br>s and APMs,<br>those analyze<br>ct or a |
| <b>Public Services and Utilities</b> (e.g., result in construction of<br>new, or expansion of existing, facilities for fire protection,<br>municipal water supplies, telecommunications, and solid<br>waste; or disrupt electric service)?<br><i>Final EIR/EIS evaluation: Less than significant with mitigation</i><br>( <i>Class II</i> )/Adverse   | ×   |  |   |
| Summary of Proposed Minor Project Refinement Impacts of   |   | nalysis in the Fir   |   |
| The requested refinement will be consistent with the public serv<br>and will not require new or expanded public facilities or service<br>result in a new significant impact or a substantial increase in the<br>public services and utilities as identified in the Final EIR/EIS.   | s. Therefore, the r   |  |   |

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.

| Final EIR/EIS Consistency Checklist   |           |                                      |     |
|---|-----------|--------------------------------------|-----|
| Would the proposed action(s) result in a new impact, or<br>increase the severity of a previously analyzed impact to:  | No Change | Potentially<br>Significant<br>Change | N/A |
| <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 refinement will not require additional or different types of construction vehicles and equipment than those discussed in the Final EIR/EIS. In addition, the total number of truck trips associated with construction of the Project will not change, and the use of the requested refinement area will affect the same roadways as those analyzed in the Final EIR/EIS (i.e., Eagle Peak Road), as well as some smaller public and private roads. With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to traffic flow 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.

**ATTACHMENT B: COMPARISON MAP** 

