

Appendix E: Minor Project Refinement Form**Provide basic information:**

MPR Request Number: MPR#4

Date Submitted to CPUC: 6/4/19 Requested Approval Date: 6/11/19

Anticipated Start Date for Proposed Action: 6/4/19 Anticipated End Date for Proposed Action: End of Construction

Describe the proposed minor Project refinement, including an explanation for why the refinements are necessary:**Proposed Minor Revisions to Disturbance Areas**

On October 19, 2018, Horizon West Transmission, LLC (HWT) submitted a request to the California Public Utilities Commission (CPUC) for a Notice to Proceed (NTP) with construction of the Suncrest Dynamic Power Support Project. As part of the compliance documentation provided as part of the NTP package, HWT provided disturbance maps for the static var compensator (SVC) and underground duct bank/overhead 230 kV alignment. The CPUC subsequently issued an NTP on December 12, 2018.

Following issuance of the NTP, HWT negotiated a lease agreement with the landowner, Dean Wilson, for the temporary laydown yard necessary for construction of the SVC. As part of those landowner negotiations, Mr. Wilson requested a minor change to the previous configuration of the temporary laydown area differing from what was previously identified in the disturbance maps. This resulted in a slight modification to the temporary disturbance areas. In addition, there was a minor change to the permanent disturbance associated with the SVC's stormwater management design. Specifically, based on conditions observed at the site once construction began, HWT's engineers and consultants recommended moving the stormwater pond and adding drainage features to capture stormwater run-on to the site so that it could be directed to the stormwater pond and/or away from the SVC pad and into stormwater control devices.

These changes (referred to collectively herein as the Proposed Project Refinements) have resulted in an overall decrease in permanent disturbance, from 6.00 acres of permanent disturbance identified in the Final Environmental Impact Report (FEIR) to 4.65 acres of permanent disturbance following the Proposed Project Refinements. The Proposed Project Refinements will also result in an overall decrease of 1.18 acres of total temporary and permanent disturbance area, from 8.59 total acres identified in the FEIR to 7.41 acres in the Proposed Project Refinements. New disturbance areas are all within areas that were previously surveyed for natural and cultural resources during the project's environmental review.

HWT's construction contractor inadvertently disturbed ground in certain areas outside the footprint presented in the drawings submitted with the request for the NTP (NTP Maps). HWT noticed these disturbance deviations to the CPUC on April 18 and May 10, 2019. Appendix A, Figure 1, illustrates the project footprint as presented in the NTP Maps and the current disturbance outside of the NTP Maps in green. Appendix A, Figure 2 illustrates the proposed changes to the temporary and permanent

disturbance areas and identifies each “Area #” to correspond to the changes further detailed below:

Area 1- Request to Convert from Temporary Disturbance to Permanent Disturbance

Area 1 is located on the north side of the SVC along Bell Bluff Truck Trail between the two access driveways. This area consists of previously disturbed/revegetated laydown area used during the construction of the San Diego Gas & Electric Company (SDG&E) Suncrest Substation, and consists of a mix of Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association and California Buckwheat Scrub habitat. The NTP Maps identified Area 1 as a temporary disturbance area that would be used for staging and laydown of materials. The Proposed Project Refinements will convert a portion of this area of temporary disturbance to permanent disturbance. This area, which is part of the area identified as Area 1, borders an Engelmann Oak tree on the east side of the area and will permanently impact approximately 0.03 acre. While this area is designated as Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association (*Quercus engelmannii* – *Q. agrifolia/Toxicodendron diversilobum* Association) in the FEIR, Section 7.3.2, Biological Resources, states that the understory component of the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association community in the vicinity of the SVC site “is not fully developed and is more similar to the *Eriogonum fasciculatum* Association” as defined in the FEIR for California Buckwheat Scrub habitat. Although this area is adjacent to one of three Engelmann Oak trees located in the northeast corner of the SVC pad, the Engelmann Oak tree will not be impacted, and only the understory vegetation around this oak tree will be impacted. This is because the drip line surrounding the Engelmann Oak tree is protected with orange construction fencing as part of preconstruction surveys conducted per Mitigation Measures BIO-3 and BIO-13 (see Mitigation Measures/Applicant Proposed Measures Compliance Tracking Table, pp. B-4 and B-10). As such, no sensitive resources associated with the Engelmann Oak tree or the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat community will be impacted.

Area 2- Request to Add New Permanent Disturbance

Area 2 is located at the northeast corner of the SVC along Bell Bluff Truck Trail. This area contains approximately 0.06 acre of understory that is associated with Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat that will be new permanent disturbance. However, while this area is designated as Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association (*Quercus engelmannii* – *Q. agrifolia/Toxicodendron diversilobum* Association) Section 7.3.2, Biological Resources, the FEIR also states that the understory component of the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association community in the vicinity of the SVC site “is not fully developed and is more similar to the *Eriogonum fasciculatum* Association” as defined in the FEIR for California Buckwheat Scrub habitat. Although this area is adjacent to several Engelmann Oak trees located in the northeast corner of the SVC pad, the Engelmann Oak trees will not be impacted, and only the understory vegetation around the trees will be impacted. Specifically, the drip lines surrounding the nearby Engelmann Oak trees are protected with orange construction fencing, and thus neither the trees nor their root zones will be impacted. As such, no sensitive resources associated with the Engelmann Oak trees or the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat community will be impacted.

Area 3- Request to Add New Temporary Disturbance Area

Area 3 is located along the eastern and southern boundaries of the project. The area at the southern edge of the project (Leased Laydown Area) will replace a portion of the previously identified laydown area on the west side of the project as depicted in the NTP Maps (Area 6). The modification of the Leased Laydown

Area was requested by Mr. Wilson (the owner of the property) in order to accommodate his use of Area 5. The eastern portion of Area 3 will temporarily extend the work area on the eastern side and enable the construction of the retaining wall described in the FEIR. The southern portion of the project occurs within previously disturbed/ revegetated areas consisting of California Buckwheat Scrub and non-native grassland. The northeastern and eastern section of the area is adjacent to several Engelmann Oak trees and associated understory, as well as previously revegetated land consisting of California Buckwheat Scrub. As stated above, the understory component of the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association community in the vicinity of the SVC site “is not fully developed and is more similar to the *Eriogonum fasciculatum* Association” as defined in the FEIR for California Buckwheat Scrub habitat. Although the work areas are adjacent to Engelmann Oak trees, the Engelmann Oak trees will not be impacted, and only the understory vegetation components between the oak trees will be impacted. Specifically, the drip lines surrounding the nearby Engelmann Oak trees are protected with orange construction fencing, and thus neither the trees nor their root zones will be impacted. As such, no sensitive resources associated with the oak trees or the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat community will be impacted.

Area 4- Request to Convert from Temporary to Permanent Disturbance Area

Area 4 is located at the southwest corner of the SVC site. This area was previously identified as temporary disturbance and is within the project footprint as provided in the NTP Maps. Due to the relocation of the stormwater pond, this area, once slated for temporary disturbance, would be converted to permanent disturbance once the requested change is approved. This location consists of California Buckwheat Scrub and no sensitive resources are located in this area.

Area 5- Request to Modify the Location of the Approved Temporary Laydown Area

Area 5, the previously identified laydown area provided in the NTP Maps, is located on the west side of the project site. The landowner, Mr. Wilson, has requested that the project not use this area and instead utilize Area 3, on the south and east sides of the project site. Area 5 has not been disturbed by project construction and will no longer be used to support construction of the project.

Area 6- Approved Temporary Laydown Area Disturbed - No Change Requested

Area 6 is part of the previously identified laydown area depicted in the NTP Maps. This area is part of the lease agreement with Mr. Wilson and will continue to be used as laydown and materials storage. This area will continue to be temporarily disturbed and no changes to this area are requested.

Describe the dimensions and area of any additional work areas and land disturbance associated with the proposed refinements. Include/attach photos, maps, or other documentation illustrating the existing conditions in the area:

Please refer to Figures 1 and 2 in Appendix A.

Provide a summary list of applicable Project requirements (e.g., APMs, MMs, etc.) for which the refinements are being requested:

All project requirements, including but not limited to MM BIO-3 and MM BIO-6, as described in the project’s Mitigation, Monitoring, and Reporting Program (MMRP), will apply to the all areas requested as part of this MPR and illustrated in Appendix A, Figure 2.

Would the proposed refinements conflict with any of the above-listed APMs, MMs, or other Project requirements or applicable laws, regulations, or policies? **No** **Yes**

Explain proposed refinements consistency/inconsistency with applicable Project requirements below.

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on: **No** **Yes**

Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)? of the site and it surroundings, or create sources of light or glare)?
FEIR Significance: Less than Significant with Mitigation

The Proposed Project Refinements will not alter any project components, such as equipment or features, that are visible from public views as identified in the FEIR. As such, the Proposed Project Refinements will only alter the location of such components in a minor fashion, and will therefore not alter permanent visual impacts as discussed in the FEIR. Impacts related to temporary construction will remain essentially the same.

Agriculture and Forestry (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?
FEIR Significance: Less than Significant

The Proposed Project Refinements occur on land mapped as “Other Land” by the Farmland Mapping and Monitoring Program, and are not located on land zoned for forest land, timberland, or timberland zoned for Timberland Production. Therefore, there will be no impacts to Agriculture or Forestry.

Air Quality (e.g., produce criteria air pollutant emissions, or expose sensitive receptors to addition pollutants)? *FEIR Significance: Less than Significant with Mitigation*

The project's construction air pollutant emissions will occur for a short period and will be well below the magnitude that will cause air quality standard violations or contribute substantially to existing or projected air quality standard violations that are measured in San Diego County. The ground disturbance analyzed in the FEIR included 6.00 acres of permanent disturbance and an additional 2.59 acres of temporary disturbance, for a total of 8.59 acres. The Proposed Project Refinements will create 4.65 acres of permanent disturbance and an additional 2.76 acres of temporary disturbance, for a total of 7.41 acres, resulting in net decrease of 1.18 acres of total disturbance. This change will result in a decrease in air quality impacts from project construction. There will be no change to permanent emissions. Impacts related to air quality will remain less than significant.

Biological Resources (e.g., have an adverse effect on sensitive or special-status species; impact riparian, wetland, or any other sensitive habitat; or conflict with local policies or ordinances protecting biological resources)? *FEIR Significance: Less than Significant with Mitigation*

The Proposed Project Refinements extended the project footprint approximately 70 feet in the northeast corner of the project site and approximately 60 feet on the southeast side of the project site. It also reduced the temporary project footprint by approximately 70 feet on the southwest side of the property. All temporary and permanent disturbance areas requested herein have been previously surveyed for natural and cultural resources during the preparation of the PEA, CEQA process, and prior to construction.

Biological surveys covered the following areas:

- Bat surveys included the area 100 feet beyond the original approved boundary.
- Hermes Copper Butterfly surveys included the area 150 meters (492 feet) beyond the original approved boundary.
- Botanical surveys included the area 100 feet beyond the original approved boundary

For work already completed, all areas were surveyed by biological monitors just before initial disturbance and monitored during initial disturbance. Botanical resource maps and on-the-ground observations by onsite biologists were used to confirm that project disturbance did not impact protected resources.

The Proposed Project Refinements will result in an increase in temporary and permanent disturbance to understory habitat associated with Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association (*Quercus engelmannii* – *Q. agrifolia*/Toxicodendron diversilobum Association). The original project design would have resulted in a permanent disturbance of approximately 0.30 acre of understory associated with Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association. The Proposed Project Refinements will result in a permanent disturbance of approximately 0.35 acre, which is an increase of approximately 0.05 acre of permanent disturbance. In addition, the Proposed Project Refinements will result in a temporary disturbance of approximately 0.09 acre of understory associated with Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association. However, as stated previously, the understory component of the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association community in the vicinity of the project site

“is not fully developed and is more similar to the *Eriogonum fasciculatum* Association” as defined in the FEIR Section 7.3.2, Biological Resources for California Buckwheat Scrub habitat. Additionally, the drip lines surrounding the Engelmann Oak trees are protected with orange construction fencing as part of preconstruction surveys conducted per Mitigation Measures BIO-3 and BIO-13 (see Mitigation Measures/Applicant Proposed Measures Compliance Tracking Table, pp. B-4 and B-10). Evidence of the flagging and protection of plant species onsite was submitted to the CPUC on February 4, 2019. Given the above, no sensitive resources associated with the Engelmann Oak trees or the Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat community will be impacted.

Also, preconstruction surveys were conducted prior to this disturbance occurring, and no individual oaks were impacted. As such, this impact will remain less than significant.

Cultural Resources (e.g., cause an adverse change to a significant historical, archeological, or paleontological resource)?

FEIR Significance: Less than Significant with Mitigation

No historical, archeological, or paleontological resources were identified by the FEIR in the project area, and none of the geological units that underlie the project area are known to be fossiliferous. The Proposed Project Refinements will not impact any known historical, cultural or paleontological resources. All new areas under the Proposed Project Refinements were surveyed for cultural and paleontological resources during the preparation of the PEA. Cultural and paleontological surveys included the area 150 meters (492 feet) beyond the original approved boundary. No known resources were identified.

As required by the MMRP, CPUC-approved archaeologists and Native American Monitors monitored all initial ground disturbing activities onsite. During construction, several previously unidentified archaeological resources were discovered. As required by the MMRP, all archaeological and/or historical items found onsite were reviewed, documented, and collected before work was allowed to continue within 50 feet of finds. All archaeological items found onsite were determined to be associated with the ineligible SUN-S-1012 site, as documented in the project’s Cultural Resources Technical Report and FEIR. Two historical fragments were found onsite and were determined to belong to the ineligible SUN-S-1002 site.

Geology, Soils, and Seismicity (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil, seismic-related ground shaking, landslides)?

FEIR Significance: Less than Significant with Mitigation

The Proposed Project Refinements will not alter impacts related to fault rupture, seismic-related ground failure, landslides, liquefaction, subsidence or expansive soil. The Proposed Project Refinements allow the addition of additional drainage features to manage stormwater run-on to the site in compliance with the project’s NPDES Construction Stormwater Permit. The Proposed Project Refinements will result in an overall decrease of 1.18 acres of disturbed area which will decrease the potential for substantial erosion or loss of topsoil.

Greenhouse Gas Emissions (e.g., generate a substantial amount of greenhouse gas [GHG] emissions, conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions or GHGs)?

FEIR Significance: Less than Significant

The Proposed Project Refinements will have no impact on greenhouse gas emissions. There are no changes to the length of the construction period, and no changes to construction equipment use. Total GHG emissions identified in the FEIR were 507.3 metric tons of CO₂e, well below the County of San Diego significance threshold of 900 Metric Tons CO₂e. Even minor changes in GHG emissions will not change the level of significance under CEQA.

Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)?

FEIR Significance: Less than Significant with Mitigation

The Proposed Project Refinements will not change the routine transport, use, and disposal of hazardous materials or the fire risk analyzed in the FEIR. Impacts related to hazards and hazardous materials will remain less than significant.

Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structure in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)?

FEIR Significance: Less than Significant with Mitigation

The Proposed Project Refinements will not alter impacts related to hydrology and water quality, including the potential for surface runoff and erosion into downstream sources. As a result of the Proposed Project Refinements, the stormwater retention pond has been moved to a more optimal location and drainage features have been added to adequately capture stormwater run-on to the site so that it can be directed to the stormwater pond. These changes will enhance the site's capability of managing stormwater and further reduce impacts. The Proposed Project Refinements will result in an overall reduction of impacts by 1.18 acres which also thereby reduces the amount of ground disturbance and potential impacts on water quality. As such, impacts related to hydrology and water quality will remain less than significant.

Land Use and Planning (e.g., physically divide an established community; conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)?

FEIR Significance: Less than Significant

The Proposed Project Refinements will have no impact on land use impacts as assessed in the FEIR. Changes in the laydown yard were made at the landowner's request. Impacts will remain less than significant.

Mineral Resources (e.g., result in the loss of known mineral resources of regional and/or state value, or availability of locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan)?

FEIR Significance: No Impact

No mineral resources are known to occur at the Proposed Project site, therefore the Proposed Project Refinements will have no impact on mineral resources.

Noise and Vibration (e.g., expose sensitive receptors to additional noise or vibration, exposure of persons to or generation of excessive ground-borne noise or vibration)?

FEIR Significance: Less than Significant with Mitigation

The Proposed Project Refinements will not change the construction methods and machinery or operational characteristics. Therefore, the Proposed Project Refinements will have no discernable impact on noise or vibration impacts.

Population and Housing (e.g., directly or indirectly induce substantial population growth in an area, or displace substantial numbers of people or existing housing)?

FEIR Significance: Less than Significant

The Proposed Project Refinements will have no impacts on population or housing.

Public Services and Utilities (e.g., result in substantial adverse physical impacts on government facilities that provide a public service; require or result in the construction of new water, wastewater treatment, or stormwater drainage facilities; have insufficient water supplies or wastewater treatment capacity available to the project from existing entitlements and resources; be served by a landfill with insufficient permitted capacity to accommodate the project's need; or fail to comply with federal, state, and local statutes and regulations for solid waste)?

FEIR Significance: Less than Significant with Mitigation

The Proposed Project Refinements will have no changes to impacts related to fire or police protection, schools, parks, or water, wastewater or solid waste facilities. The revised location and size of the stormwater detention basin will still adequately handle onsite drainage and will not connect to the municipal storm drain system. Impacts related to public services and utilities will remain less than significant.

Recreation (e.g., increase the use of, or cause adverse effects on, existing parks or other recreational facilities)?

FEIR Significance: Less than Significant

The Proposed Project Refinements will have no impacts on recreation.

Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)?

FEIR Significance: Less than Significant with Mitigation

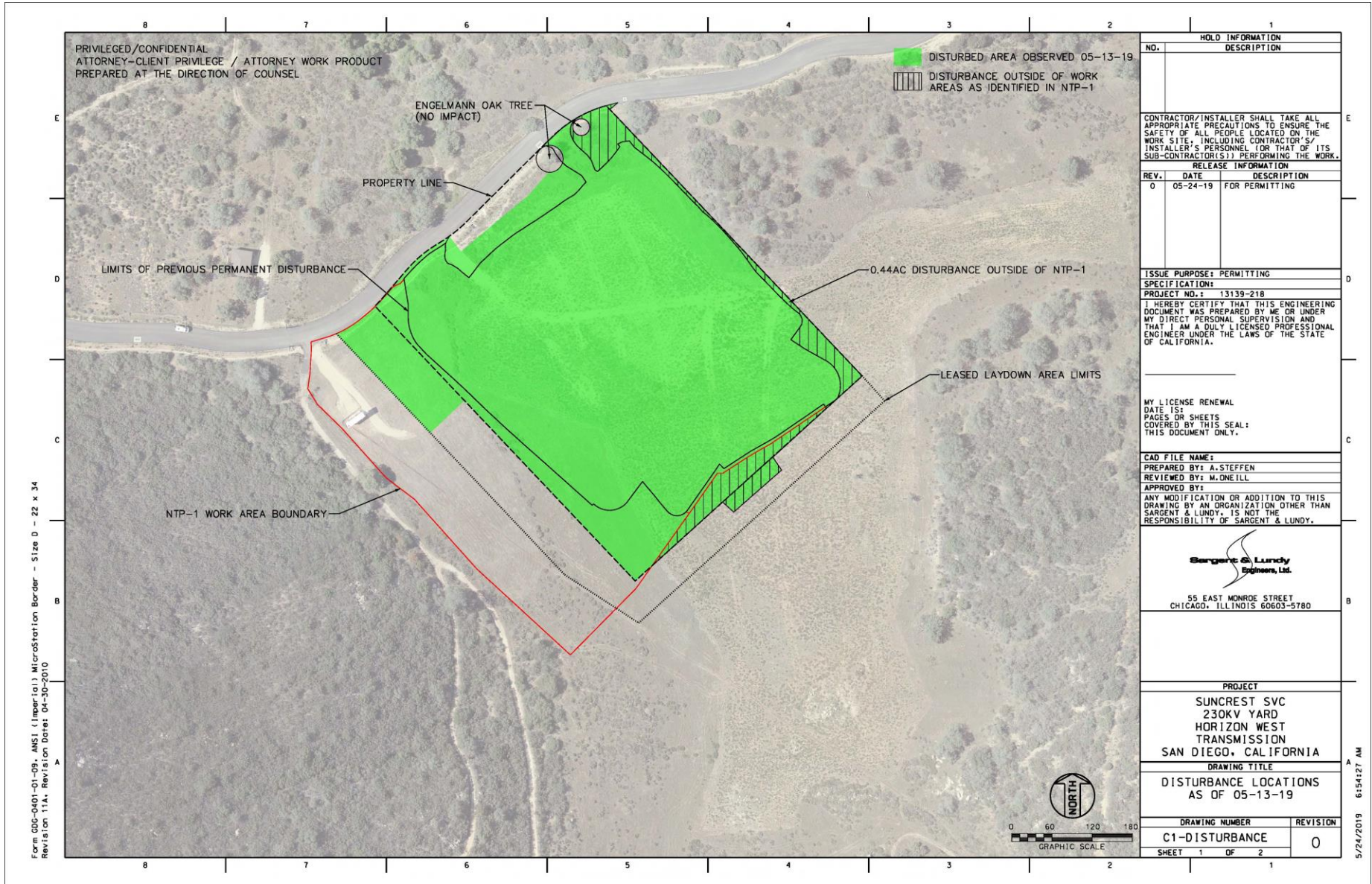
The Proposed Project Refinements will not change the construction methods and machinery or operational characteristics. Therefore, the Proposed Project Refinements will not alter construction traffic volumes. Impacts related to traffic volume and emergency access will remain less than significant with mitigation.

Describe any applicable consultation with other governmental agencies conducted for the proposed refinements:

No consultation with other governmental agencies is required for the Proposed Project Refinements.

APPENDIX A: FIGURES

Figure 1: Current Disturbance Outside NTP Mapped Boundaries



PRIVILEGED/CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGE / ATTORNEY WORK PRODUCT
PREPARED AT THE DIRECTION OF COUNSEL

DISTURBED AREA OBSERVED 05-13-19
 DISTURBANCE OUTSIDE OF WORK AREAS AS IDENTIFIED IN NTP-1

HOLD INFORMATION	
NO.	DESCRIPTION

CONTRACTOR/INSTALLER SHALL TAKE ALL APPROPRIATE PRECAUTIONS TO ENSURE THE SAFETY OF ALL PEOPLE LOCATED ON THE WORK SITE, INCLUDING CONTRACTOR'S, INSTALLER'S PERSONNEL (OR THAT OF ITS SUB-CONTRACTOR(S)) PERFORMING THE WORK.

RELEASE INFORMATION		
REV.	DATE	DESCRIPTION
0	05-24-19	FOR PERMITTING

ISSUE PURPOSE: PERMITTING
 SPECIFICATION:
 PROJECT NO.: 13133-218
 I HEREBY CERTIFY THAT THIS ENGINEERING DOCUMENT WAS PREPARED BY ME OR UNDER MY DIRECT PERSONAL SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF CALIFORNIA.

MY LICENSE RENEWAL DATE IS:
 PAGES OR SHEETS COVERED BY THIS SEAL:
 THIS DOCUMENT ONLY.

CAD FILE NAME:
 PREPARED BY: A. STEFFEN
 REVIEWED BY: M. ONEILL
 APPROVED BY:

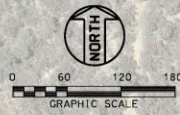
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 CHICAGO, ILLINOIS 60603-5780

PROJECT
 SUNCREST SVC
 230KV YARD
 HORIZON WEST
 TRANSMISSION
 SAN DIEGO, CALIFORNIA

DRAWING TITLE
 DISTURBANCE LOCATIONS
 AS OF 05-13-19



DRAWING NUMBER	REVISION
C1-DISTURBANCE	0
SHEET 1 OF 2	1

Form GDC-0401-01-09, ANSI (Imperial) MicroStation Border - Size D - 22 x 34
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Figure 2: Proposed Project Refinements to Temporary and Permanent Work Areas

