



**CLEVELAND NATIONAL FOREST POWER LINE
REPLACEMENT PROJECTS**



MINOR PROJECT REFINEMENT REQUEST FORM

Date Submitted:	12-27-19	Request #:	043
Date Approval Required:	01-10-20	Landowner:	XXX
APN:	XXX-XXX-XX		
Refinement from (check all that apply):			
<input type="checkbox"/> Mitigation Measure	<input type="checkbox"/> APM	<input checked="" type="checkbox"/> Project Description	<input type="checkbox"/> Drawing <input checked="" type="checkbox"/> Other
Identify source (mitigation measure, project description, etc.):			
<p>Notice to Proceed request #22/Minor Project Refinement (MPR) request #31 for Transmission Line (TL) 625C of the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest Power Line Replacement Projects (Project) was approved by the California Public Utilities Commission (CPUC) and United States Forest Service (USFS) on June 18, 2019. Due to the discovery of sensitive cultural resources at the approved replacement pole location for Pole Z272939 (Location 41) during construction on TL625C, the replacement pole location needs to be shifted to avoid these sensitive resources. A brief description and justification of the refinement is provided on page 2 of this MPR request.</p>			
Attachments (check all that apply):			
<input checked="" type="checkbox"/> Refinement Request Screening Form (see Attachment A: Minor Project Refinement Request Screening Form)	<input type="checkbox"/> Photos	<input checked="" type="checkbox"/> Maps (See Attachment B: Comparison Map)	<input type="checkbox"/> Other
<p>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).</p>			
<p>(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area?</p> <p>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 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 are provided 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) 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?</p> <p>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.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

(d) Does the proposed refinement trigger an additional permit requirement?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Describe refinement being requested (attach drawings and photos as needed):			
<p>As depicted in Attachment B: Comparison Map, SDG&E is requesting to shift the replacement pole for Pole Z272939 (Location 41) approximately 69 feet southwest 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 0.03 acre of temporary impacts to native vegetation. The new temporary pole work area will be accessed via an existing, approved footpath. The previously approved temporary pole work area for Pole Z272939 will be used to remove the existing wood pole and perform the wire transfer. 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.</p>			
Provide need for refinement (attach drawings and photos as needed):			
<p>Following the discovery of sensitive cultural resources at Pole Z272939 (Location 41), a Notice of Discoveries for this location was sent out by the USFS to the Consulting Parties to the Project's Programmatic Agreement on October 22, 2019. Archaeological monitors from ASM Affiliates, Inc. and Native American Monitors from Grey Wolf Monitoring were on site during the discoveries. Following the Notice of Discoveries for this location, the La Posta Band of Diegueño Mission Indians was designated as the Most Likely Descendent (MLD) for this location. The MLD requested that SDG&E review engineering options to avoid the resources discovered at this location. As a result, this MPR is being requested to shift the pole to a location informed by archaeological survey and testing results.</p>			
Date refinement is expected to be implemented:		01-13-20	
Resource Agency Coordination			
Resource Agency	Name	Action Required	Date
Documentation (see attached if yes)			
Not Applicable (N/A)	N/A	N/A	N/A
<input type="checkbox"/> Yes	<input checked="" 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 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
<p>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)?</p> <p><i>Final EIR/EIS evaluation¹: Significant and unavoidable (Class I)/Adverse and unavoidable</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Visual Resources:</p> <p>Shifting the replacement pole for Pole Z272939 (Location 41) will not substantially increase impacts to visual resources as the pole will be located within the existing transmission line 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 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.</p>			

¹ 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
<p>Air Quality (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>	☒	☐	☐
<p>Summary of Proposed Minor Project Refinement Impacts on Air Quality:</p> <p>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 sensitive receptors. 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 nearby sensitive receptors 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.</p>			
<p>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)?</p> <p><i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i></p>	☒	☐	☐
<p>Summary of Proposed Minor Project Refinement Impacts on Biological Resources:</p> <p>The requested refinement area was surveyed for sensitive vegetation communities and special-status plant and wildlife species during initial Project surveys. In addition, supplemental surveys conducted in 2018 and 2019 along Transmission Line (TL) 625C included a bat roost assessment and follow-up surveys for Townsend’s big-eared bat (<i>Corynorhinus townsendii</i>) and other special-status bat species; protocol-level surveys for Hermes copper butterfly (<i>Lycaena hermes</i>); and focused surveys for special-status plants.</p> <p>The requested refinement will result in approximately 0.03 acre of temporary impacts to southern mixed chaparral.² 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 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.</p>			

² Southern mixed chaparral falls within 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 increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Cultural and Paleontological Resources:</p> <p>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 2017, 2018, and 2019. No new cultural resources were recorded, and one previously recorded cultural resource was re-located during the supplemental surveys.</p> <p>Following a discovery during construction at Pole Z272939 (Location 41), and at the request of the Most Likely Descendant, this MPR was developed to relocate Pole Z272939 outside of culturally sensitive deposits (specifically including the new elements not previously identified). However, the new pole location remains inside the existing site boundary. In preparation for this MPR, archaeological surveys and exploratory testing were conducted at the new pole location to identify the presence or absence of human remains at the new pole location. No human remains were recovered from the exploratory testing conducted at the new pole location. The new pole work area will be accessed via an existing, approved footpath. In order to reduce impacts to sensitive cultural resources in the area, Environmentally Sensitive Area fencing is recommended to be installed around the new temporary pole work area for Pole Z272939 (Location 41). Additionally, archaeological and Native American monitors will lead micropile pin and ground rod trench excavations and monitor during any ground-disturbing activities. 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.</p> <p>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.</p>			
<p>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)?</p> <p><i>Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:</p> <p>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.</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	N/A
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Public Health and Safety:</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 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.</p>			
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Fire and Fuels Management:</p> <p>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.</p>			
<p>Hydrology and Water Quality (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>Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:</p> <p>The refinement area was partially 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 2019. The requested refinement does not contain any waters of the state or the U.S. 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 79A, TL625C, and TL629A Storm Water Pollution Prevention Plan (Waste Discharge Identification #9 37C386349) and submitted to the State Water Resources Control Board’s Stormwater Multiple Applications and Report Tracking System. 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.</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	N/A
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Land Use:</p> <p>In accordance with the Construction Notification Plan and MM LU-1, property owners within 1,000 feet of TL625C were notified of construction activities associated with Notice to Proceed #22 on May 22, 2019. 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 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>			
<p>Noise (e.g., disturb sensitive receptors and violate local rules, standards, and/or ordinances; or cause ground borne vibration)?</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>Summary of Proposed Minor Project Refinement Impacts on Noise:</p> <p>Construction-related noise will be generated within the requested refinement area due to pole work, vegetation removal, and large equipment operation. The refinement area is located within 1,000 feet of sensitive receptors. Potential noise impacts to sensitive receptors within 1,000 feet of Project components were analyzed in the Final EIR/EIS. Use of the refinement area may result in temporary increases in noise levels; however, the construction activities will be short-term and temporary. In addition, with implementation of noise-related MMs and APMs, noise impacts from construction activities associated with the refinement area will be equivalent to 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.</p>			
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Public Services and Utilities:</p> <p>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 public 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>			

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
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Recreation:</p> <p>The requested refinement area is located within the approved TL625C alignment and is more than a mile from the Pine Creek Wilderness. Consistent with the analysis in the Final EIR/EIS, use of the refinement area will not reduce or preclude access or visitation to this recreational area, nor will it 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>			
<p>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)?</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>Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:</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. 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., Japatul Valley Road and Larry Lane). With the implementation of APM TRANS-01 through APM TRANS-05, potential temporary impacts to the existing levels of service (LOS)³ 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>			


³ Japatul Valley Road has an LOS of A through C and an LOS does not exist for Larry Lane.

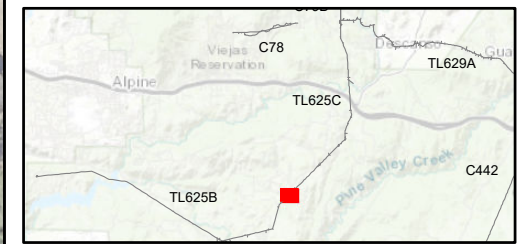
ATTACHMENT B: COMPARISON MAP

**Attachment B:
Comparison Map
TL625C Map 1 of 1**

**Cleveland National Forest
Power Line Replacement Projects**








NTP #22/MPR #31

-  Removal
-  Wood-to-Steel Replacement
-  Wood-to-Steel Replacement 12 kV Only
-  New Anchor Installation
-  Remove From Service Anchor
-  Anchor Work Area
-  Temporary Pole Work Area
-  Footpath
-  Navigation Access Road
-  Wood-to-Steel Replacement





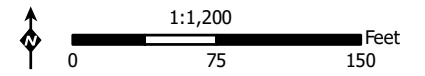
Final Design

NTP #22/MPR #31

-  Removal
-  Wood-to-Steel Replacement 12 kV Only
-  New Anchor Installation
-  Remove From Service Anchor
-  Footpath
-  Navigation Access Road
-  Wood-to-Steel Replacement

MPR #43

-  New Steel Pole
-  Temporary Pole Work Area



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