

TIE-LINE 637 WOOD-TO-STEEL PROJECT MINOR PROJECT REFINEMENT REQUEST FORM

Date Requested:		May 22, 2014		Report #:		008	
Date Approved:		June 2, 2014		Approval Agency:		No other agency approval is required.	
Property Owner(s):		Private and SDG&E Right-of-Way (ROW).		Location/Milepost:		Stringing Site Nos. 14 and 15	
Land Use/area occurVegetativewithin distCover:non-distur		The proposed in area occurs prim within disturbed non-disturbed c sage scrub habit	marily d and coastal Sensitive Re		Resources:	Sensitive habitats including Coastal Sage Scrub.	
Refinement / N	Modi	ification From (check all	that apply)	:		
Permit	P	Plan/Procedure	Spe	cification	Drawing	Mitigation Measure (MM)	
Other: String	ging S	ite Modification					
San Diego Gas & Electric Company (SDG&E) is proposing to utilize a different temporary workspace for Stringing Site No. 14 (SS-14), located near Structure No. P100, and Stringing Site No. 15 (SS-15), located between Structure Nos. P100 and P101, than the workspace area that was originally described within SDG&E's application for a Permit to Construct (PTC) for the TL 637 Project (refer to Proponent's Environmental Assessment [PEA] Appendix 3-B) and the Final Initial Study/ Mitigated Negative Declaration (IS/MND) (see Figure 1 and refer to MND Attachment A). Description of Refinement SDG&E proposes to use a different temporary workspace area for SS-14 and SS-15, near Structure No. P100 in order to safely and successfully conduct stringing activities. The proposed modification shifts the stringing sites off of the existing access road onto the north side of the road, and modifies the configurations to trapezoid shapes. The modified SS-14 area is approximately 46 feet by 73 feet (average length and width) and will result in approximately 3,391 square feet of temporary impacts to coastal sage scrub habitat. The modified SS-15 area is approximately 32							
feet by 54 feet a	nd w	ill result in approx	kimately :	1,668 square	feet of tempora	ry impacts to disturbed coastal sage	
scrub habitat. The original SS-14 and SS-15 temporary workspace areas would have resulted in a total of approximately 4,200 square feet (14 feet by 150 feet for each site) of temporary impacts (see Figure 1).							
Figure 2 depicts the proposed new temporary workspace for SS-14 and SS-15 and the original SS-14 and SS-15 locations within the existing access road. Photograph Nos. 1 and 2 depict the proposed new temporary workspace area for SS-14. Photograph No. 3 depicts the proposed new temporary workspace area for SS-15.							
Original Condition:							
SS-14 and SS-15 were originally planned to be located within two discrete 14 foot by 150 foot areas located entirely within the existing access road adjacent to Structure No. P100 (refer to Figure 1).							
Justification for Change:							
Following in-field review of the stringing sites, construction crews identified potential logistical and safety concerns with utilizing the originally planned temporary workspace areas for SS-14 and SS-15 (refer to Figure 1). The original location of SS-14 and SS-15 occurs within the main access road; and in order to maintain clear access roads in the event of an emergency as well as maintain an unobstructed aerial path to safely pull conductor, the stringing sites need to be moved off the road. The modified SS-14 and SS-15 temporary workspace areas are advantageous over							

using the existing SS-14 and SS-15 locations because they are safer to use in the event of an emergency, and the

areas are more conducive to the proposed work activities.

Maps and Figures

Figure 1 (extracted from PEA Appendix 3-B, Sheet 25 of 50) depicts the originally proposed temporary workspace areas for Stringing Site Nos. 14 and 15. Figure 2 depicts the proposed new temporary workspace areas for Stringing Site Nos. 14 and 15 near Structure No. P100.



Figure 1: MPR Overview Map

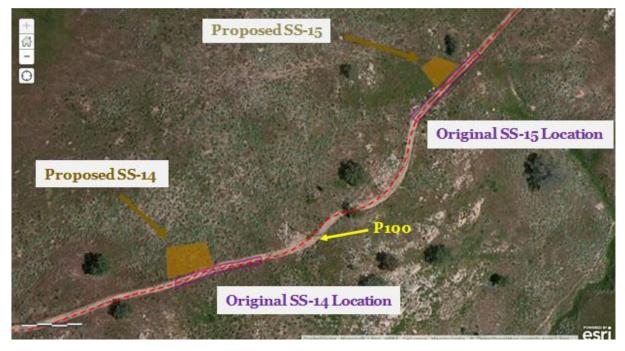


Figure 2: Aerial image of proposed Stringing Site Nos. 14 and 15 modification.



Photograph 1: View of proposed Stringing Site No. 14 with approximate boundary outlined in brown, facing northwest.



Photograph 2: View of proposed Stringing Site No. 14 with approximate boundary outlined in brown and berm flattening area shown in dashed blue, facing northwest.



Photograph 3: View of proposed Stringing Site No. 15 with approximate boundary outlined in brown, facing northeast.

Environmental Impact:

Utilization of the new proposed temporary workspace areas for SS-14 and SS-15 near Structure No. P100 in place of the originally identified stringing site areas within the existing access road would not change the nature or increase the severity of any impacts disclosed within the TL 637 IS/MND; would not result in alteration to Applicant Proposed Measures (APMs); would not alter existing mitigation measures; would not require new mitigation measures; and would not require new permits, new regulatory approval, or other regulatory consultation. Specific discussions for each resource area are provided below.

Concurrence:

The new proposed temporary workspace areas for SS-14 and SS-15 are located adjacent and to the north of the original SS-14 and SS-15 locations, and off of the existing access road on private property. The property owner has approved the modified stringing site areas (SS-14 and SS-15) for Project-related use. No additional concurrence is required for the proposed MPR.

Resources:			
Biological	☐ No Resources Present	Resources Present	□ N/A

Previous Biological Survey Report Reference:

Biological resources along the Project alignment were studied, reviewed, and documented as part of SDG&E's application for a PTC for the TL 637 Project (see TL 637 PTC Application, Volume II of II, Appendix 4.4-A). These resources were also discussed within the CPUC-conducted CEQA review process (see the TL 637 Final IS/MND).

The new proposed temporary workspace areas for SS-14 and SS-15 have been re-evaluated for biological resources. The proposed impact areas occur within disturbed and non-disturbed coastal sage scrub habitat adjacent to an existing access road. No significant impacts to biological resources are anticipated to occur as a result of the proposed modification to SS-14 and SS-15 due to implementation of existing biological resources APMs and mitigation measures.

Attachment A contains maps showing known resources (cultural, biological, and aquatic) within the vicinity of the proposed SS-14 and SS-15 modification.

Aquatic Resources:					
While there is an aquatic resource present within the vicinity of SS-15, no impacts to this feature are expected due to the proposed stringing site modifications. As designed, the proposed stringing sites will avoid Federal and State jurisdictional waters in the area and approval would not be required. No additional minimization measures or aquatic resource monitoring would be required beyond what was included within the TL 637 Final MND.					
Cultural		Resources Present	Within Project Component		
Cultural	N/A (paved/graveled area or no ground disturbance)				
Previous Cultural Su	rvey Report Reference:				
Cultural and paleontological resources along the Project alignment were studied, reviewed, and documented as part of SDG&E's application for a PTC for the TL 637 Project (see TL 637 PTC Application, Volume II of II, Appendix 4.5-A and the Inventory of Cultural Resources submitted as Response to CPUC Data Request No. 1). These resources were also discussed within the CPUC-conducted CEQA review process (see the TL 637 Final IS/MND). Attachment A contains maps showing known resources (cultural, biological, and aquatic). There are no cultural and paleontological resources present within the area. No impacts to cultural resources are anticipated to occur as a result of the proposed activities. The proposed area was re-surveyed on 5/08/14 for potential resources by an approved archaeological monitor and no cultural resources were observed in the area. No further mitigation measures are recommended and no monitoring will be required to utilize the modified stringing site locations. No impacts to paleontological resources are anticipated to occur as a result of the proposed activities.					
Disturbance Acreage Changes?					
Original Disturbance Acreage: The previously contemplated temporary workspace areas for SS-14 and SS-15 would have resulted in a total disturbance area of approximately 4,200 square feet (150 feet long by 14 feet wide for both locations) adjacent to Structure No. P100 (refer to Figure 1). New Disturbance Acreage: The proposed new temporary workspace area for SS-14 is anticipated to result in a disturbance area of approximately 3,391 square feet (approximately 73 feet long [average] by 46 feet wide [average]) as shown in Figure 2. The proposed new temporary workspace area for SS-15 is anticipated to result in a disturbance area of approximately 1,668 square feet (54 feet long by 32 feet wide) as shown in Figure 2. This would result in an additional disturbance area of approximately 859 square feet from the original area as a result of the proposed					

construction activities.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not affect any of the CEQA criterion relating to geology, soils, or seismicity. Minor dirt work would be required consisting of:
		 leveling of an existing berm by approximately 1-2 feet within an approximately 120 square foot area (4 feet by 30 feet) located where the southwest area of SS-14 meets the existing access road to allow for vehicles to access the site (refer to Photograph No. 2);
		 temporary repositioning of small boulders/large rocks (1-2 feet in length) outside the work area (SS-15); and
		minor smoothing activities of the existing surface (SS-14 and SS-15).
		Site preparation would also consist of vegetation trimming/mowing within the footprint of proposed activities (SS-14 and SS-15) and the area would be used for parking equipment and for wire pulling activities. The trimmed vegetation will be removed and properly disposed of or will be cut into small segments and spread nearby in order to maintain compliance with fire safety and vegetation management procedures.
		The modified stringing site areas would be designed and constructed in a similar manner as other stringing sites included as part of the TL 637 project. Applicable design standards and applicable APMs relating to geology, soils, and seismicity would be applied to the stringing site areas and would not be required to be altered, expanded, or otherwise changed in order to ensure that new no impacts would result. When the stringing site areas are no longer needed for construction activities, the disturbed area will be restored, as needed and as appropriate, to approximate pre-construction conditions. The landowner has stated that the repositioned rocks/boulders will not need to be returned to their approximate pre-existing locations. The area will be raked by laborers in order to prepare for potential hydro-seeding, if required.
Agency Consultation?	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	□ Y⊠ N	Utilization of the modified SS-14 and SS-15 temporary workspace areas would not require any new potentially hazardous materials to be used, would not create any new hazardous waste not disclosed within the CEQA review process, would not expose any sensitive receptors not previously identified, and would not create any new hazard not previously disclosed. The modified SS-14 and SS-15 areas will reduce potential hazards for the Project by ensuring the access road will be clear in the event of an emergency. Applicable project design standards, APMs, and mitigation measures relating to hazards and hazardous materials would be implemented for the modified stringing site areas and would not be required to be altered, expanded, or otherwise changed in order to ensure that no impacts would result.
Agency Consultation?	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to hazards or hazardous materials.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Hydrology	☐ Y ⊠ N	Utilization of the proposed modification to SS-14 and SS-15 in place of the originally planned SS-14 and SS-15 areas would not affect hydrology and water quality in a manner different from the impacts assessed as part of the CEQA review process. Appropriate stormwater Best Management Practices (BMPs) are installed and maintained throughout the proposed construction activities, including during utilization of the proposed modifications to SS-14 and SS-15. Preconstruction vegetation will be documented and a post-construction analysis will be conducted. The Storm Water Pollution Prevention Plan (SWPPP) closure recommendation will include installing hydroseeding with Bonded Fiber Matrix (BFM) if post-construction conditions reveal that vegetation has been removed/damaged and needs to be restored. Any topsoil removed will be stockpiled, preserved, and properly protected per SDG&E's BMP Manual; to be used for vegetation restoration.
Agency Consultation?	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to hydrology or water quality.
Cultural Resources	□ Y⊠ N	No impacts to cultural resources are anticipated to occur as a result of the proposed activities. The proposed area has been re-surveyed for potential resources by an approved archaeological monitor and no surface resources were identified within the disturbance footprint. No monitoring would be required to utilize the modified stringing sites (SS-14 and SS-15). Neither of the two modified stringing site areas (SS-14 and SS-15) occurs in the vicinity of known sensitive cultural resources. No impacts to paleontological resources are anticipated to occur as a result the proposed activities.
Agency Consultation?	☐ Y⊠ N	Existing APMs adequately reduce the potential for impacts to cultural and paleontological resources to a level less than significant consistent with the impacts disclosed within the CEQA review process. Therefore, no new agency or tribal consultation would be required.
Traffic and Circulation	☐ Y ⊠ N	Constructing the new proposed temporary workspace areas for SS-14 and SS-15 would not affect traffic and circulation in a manner different from the impacts assessed as part of the CEQA review process. The modified SS-14 and SS-15 areas would be constructed utilizing construction crews and equipment that are already present on the project. No new traffic on public roadways would be generated. Therefore, no new or more severe impacts would occur.
Agency Consultation?	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to traffic and circulation.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Air Quality	□ Y ⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would be established utilizing construction crews and equipment that are already active on the TL 637 project and the stringing activities would be the same as originally proposed. Any change in the anticipated air emissions would be negligible as the increase in use of equipment to establish the modified stringing site areas would be sufficiently minor such that any increase in emissions would not result in significant impacts (exceedence of established thresholds) or a substantial increase in the severity of impacts as analyzed and disclosed within the CEQA review Process.
Agency Consultation?	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to air quality.
Noise and Vibration	□ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 are not located near noise sensitive areas. No new or altered APMs or mitigation measures would be required and impacts would be similar to those disclosed within the CEQA review process.
Agency Consultation?	☐ Y⊠ N	The new proposed temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to noise and vibration.
Visual Resources	☐ Y⊠ N	No permanent change in impacts to visual resources would result from utilization of the proposed modifications to SS-14 and SS-15. Temporary impacts would not differ from those analyzed and disclosed within the CEQA review process.
Agency Consultation?	☐ Y⊠ N	The new temporary workspace areas for SS-14 and SS-15 would not require agency consultation relating to visual resources.
Vegetation and Wildlife	⊠ Y □ N	No significant impacts to biological resources are anticipated to occur as a result of the new proposed temporary workspace areas for SS-14 and SS-15. Vegetation trimming/mowing within the footprint of proposed activities will be required. The trimmed vegetation will be removed and properly disposed of or will be cut into small segments and spread nearby in order to maintain compliance with fire safety and vegetation management plans.
		The proposed SS-14 workspace area occurs within an open area of approximately 3,391 square feet of coastal sage scrub habitat. Anticipated temporary impacts as a result of the proposed SS-14 modifications would include both native and nonnative vegetation. Sensitive coastal sage scrub habitat within the proposed SS-14 area is dominated by native plant species including California sagebrush (<i>Artemesia californica</i>), white sage (<i>Salvia apiana</i>), California buckwheat (<i>Eriogonum fasiculatum</i>), California peony (<i>Paeonia californica</i>), and non-native species including red-stem filaree (<i>Erodium cicutarium</i>). No sensitive biological resources, including nesting birds, were observed during the field survey.
		The proposed SS-15 workspace area occurs within approximately 1,668 square feet of disturbed coastal sage scrub habitat. Anticipated temporary impacts as a result of the proposed SS-14 modifications would include both native and nonnative vegetation. Sensitive coastal sage scrub habitat within the proposed SS-14 area is dominated by red-stem filaree with occasional California sagebrush and white sage. The area is further surrounded by fire recovering coastal sage scrub

CEQA Section	applical		ine potential impact or (N) briefly explain why CEQA section isn't able. If (Y), describe original and new level of impact, and nee/minimization measures to be taken.			
		during th	No sensitive biological resounce field survey. The propose eet of sensitive coastal sage s	ed work area would include ι		
	of th and the S 1 in t SS-1		No significant impacts to sensitive biological resources are anticipated as a result of the proposed work due to implementation of existing biological resources APMs and mitigation measures. All impacts to sensitive habitats will be documented per the SDG&E Natural Community Conservation Plan (NCCP) as included as APM BIO-1 in the Post Construction Report (PCR). The proposed modifications to SS-14 and SS-15 will result in a total of 5,059 square feet of coastal sage scrub habitat being entered into the Enhancement Program.			
Agency Consultation?	□ Y		proposed temporary workspagency consultation relating tes.			
Resource Agency	y Coordinat	tion / Approv	als			
Resource Agency		Date	Name (print)	Signature		
N/A					Reviewed	
					Approved Approved with Conditions (see below) Denied	
For CPUC Compl	iance Mana	ager Use Only	f			
Refinement Approved			Refinement Denied	Beyond Authority		

Conditions of Approval or Reason for Denial		
Prepared by:	Date:	

Minor Project Refinement Definitions

Project refinements are strictly limited to minor changes that will not trigger less restrictive or new discretionary permit requirements, that do not increase or create impacts, and that comply with the intent of the mitigation measures.

Project Change Level	Description	Example
Level 1 (Minor Change)	Temporary actions that will not affect biological or cultural resources or deviate from APMs, MMs, or permit requirements; use of existing private resources (i.e., private road, well) with permission	Temporary use of an existing access road, storage yard, well, hydrant, etc. not associated with current project
Level 2 (Major Change)	Changes to established mitigation protocols or project activities due to new information or improved techniques that result in temporary, insignificant impacts on resources	Installing additional disposal sites; road widening or additional grading; changes to seed mix for restoration if does not significantly alter final targeted vegetation composition
Petition for Modification	Significant, long-term changes to construction plan or mitigation protocol that require additional biological or cultural surveys or verification; discovery of omissions or errors in project documents (permits, MMs, APMs) that jeopardize biological or cultural resources; discovery of new and significant biological or cultural resources that require new avoidance measures	Construction of a new access road or bridge; discovery of new sensitive species or habitat not initially described in project documents; changes to seed mix for restoration that significantly alter final targeted vegetation composition