

TIE-LINE 637 WOOD-TO-STEEL PROJECT

MINOR PROJECT REFINEMENT REQUEST FORM

Date Requested:		April 30, 2014		Report #:			004	
Date Approved:		May 5, 2014		Approval Agency:			County of San Diego Simon Preserve (TA-1, TA-2, TA-3). No other agency approval required for TA-4 and TA- 5.	
Property Owner(s):		SDG&E Right-of-Way (ROW), Private, and the County of San Diego		Location/	Location/Milepost:		Turn-around area locations identified in Table 1	
Land Use/ Vegetative Cover:		The proposed impact area occurs within bare ground and disturbed habitat (existing non- approved project access roads), and non- native grassland.		Sensitive Resources:			Cultural and Aquatic Resources (see Attachment A – Resources Map)	
Refinement /	Mod	ification From (check all	that apply):			
🗌 Permit	E F	Plan/Procedure	🗌 Spe	cification	Drawing] Mitigation Measure (MM)	
Other: Turn	-arou	nd areas				•		
San Diego Gas & Electric Company (SDG&E) is proposing to utilize five temporary turn-around areas that differ from the temporary workspace areas that were originally described within the Proponent's Environmental Assessment [PEA] and the final Initial Study/ Mitigated Negative Declaration (IS/MND) for the TL 637 Project (refer to PEA Appendix 3-B) and the MND (refer to MND Attachment A).					nent's Environmental Assessment			
Description o								
SDG&E proposes to utilize five temporary turn-around areas in order to maintain clear accessible roads when construction is occurring and to reduce unauthorized off-road vehicular travel (see Table 1). The proposed modifications would require no groundbreaking activities, and only one of the turn-around areas (TA-2) would require limited vegetation trimming. The proposed temporary turn-around areas (TA-1 through TA-5) would be used for vehicle turn-around areas, vehicle passing, and temporary parking of construction vehicles. The proposed use of the turn-around areas in Simon Preserve (TA-1 through TA-3) will not prohibit recreational pedestrians from utilizing the road and will not block the existing access road.								
Turn-around area No. 1 (TA-1) is approximately 60 feet long and 14 feet wide (average), and is located on the south side of the existing access road between Structure Nos. P37 and P38. TA-1 will result in approximately 860 square feet of temporary impacts to existing bare ground habitat located within an existing access road, as shown in Figure 1 and Photograph Nos. 1a and 1b.								
Turn-around area No. 2 (TA-2) is approximately 15 feet wide by 30 feet long and is located on the east side of the main access road to Structure No. P24, approximately 850 feet southwest of Structure No. P24. TA-2 will result in approximately 450 square feet of temporary impacts to non-native grassland directly adjacent to an existing Project approved access road, as shown in Figure 2a and 2b and Photograph No. 2. Vegetation trimming would be required in order to establish the area for vehicle use, in compliance with the Project Fire Plan.								
Turn-around area No.3 (TA-3) is approximately 10 feet wide and 50 feet long, and is located to the south of the existing access road between Structure Nos. P29 and P30. TA-3 will result in approximately 525 square feet of								

temporary impacts to bare ground habitat located within an existing access road, as shown in Figure 3 and Photograph No. 3.

Turn-around area No. 4 (TA-4) is approximately 90 feet long, with a width varying from 15 to 30 feet and is located west of the overland travel access entrance to Structure No. P92 on the north side of the existing main project access road. TA-4 will result in approximately 1,315 square feet of temporary impacts to bare ground habitat located within an existing access road, as shown in Figure 4 and Photograph No. 4.

Turn-around area No. 5 (TA-5) is approximately 11 feet wide and 25 feet long, and is located between Structure Nos. P97 and P98. TA-5 will result in approximately 270 square feet of temporary impacts to bare ground habitat located within an existing access road, as shown in Figure 5 and Photograph 5.

Original Condition:

The locations where the proposed turn-around areas occur are either adjacent to existing access roads (TA-2) or within existing, non-project approved access roads (TA-1, TA-3, TA-4 and TA-5) that were not identified as temporary workspace areas within the PEA or Final IS/MND for the TL 637 Project.

Justification for Change:

Following in-field review, construction crews identified potential logistical and safety concerns with vehicular travel along the existing and project approved access roads. The new proposed temporary turn-around areas are necessary because they promote safe egress routes in the event of an emergency, will maintain clear accessible roads when construction is occurring, and will reduce unauthorized off-road vehicular travel. Additionally, the TA-2 is necessary to allow head-on vehicle travel to pass by one another safely.

Tables

Table 1, Turn-around Area Summary lists the turn-around areas described within this MPR request and includes their location, temporary impact area, existing conditions, sensitive resources, and reference to Figures/Photographs.

Turn-around Area	Location	Temporary Impact Area	Existing Conditions	Sensitive Resources	Reference
TA-1	South of existing access road between P37 and P38; occurs within County of San Diego Simon Preserve	860 square feet	Bare ground and disturbed habitat	Cultural and Aquatic	Figure 1; Photographs Nos. 1a and 1b
TA-2	East side of the main access road to P24, 850 feet southwest of P24; occurs within County of San Diego Simon Preserve	850 square feet	Non-native grassland habitat	Cultural	Figure 2a and 2b; Photograph No. 2
TA-3	South of existing access road between P29 and P30; occurs within County of San Diego Simon Preserve	525 square feet	Bare ground and disturbed habitat	none	Figure 3; Photograph No.3
TA-4	West of the overland travel entrance to P92	1,315 square feet	Bare ground	Aquatic	Figure 4; Photograph No. 4
TA-5	Between P97 and P98 along main access road	270 square feet	Bare ground and disturbed habitat	none	Figure 5; Photograph No. 5

Table 1: Turn-around Area Summary

Maps and Figures

Figures 1 through 5 depict the proposed temporary turn-around areas (TA-1, TA-2, TA-3, TA-4 and TA-5). Photograph Nos. 1 through 5 show the existing conditions of the proposed temporary turn-around areas (TA-1, TA-2, TA-3, TA-4 and TA-5) and approximate boundaries of the proposed temporary workspace. Refer to Table 1 for references to figures and photographs for each of the identified turn-around areas.



Figure 1: Aerial Image of proposed turn-around area (TA-1) south of the main access road between Structure Nos. P37 and P38.



Figure 2a: Aerial Image of proposed turn-around area (TA-2) south of Structure No. P24 along main access road.



Figure 2b: Close-up Aerial Image of proposed turn-around area (TA-2) along main access road.



Figure 3: Aerial Image of proposed turn-around area (TA-3) south of the main access road south of Structure No. P29.



Figure 4: Aerial Image of proposed turn-around area (TA-4) southeast of Structure Nos. P91 and P92. Segment of overland travel route is shown as orange line.

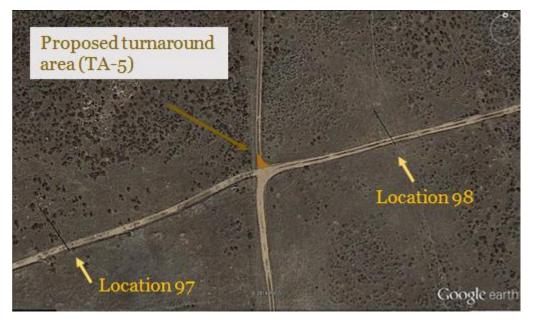


Figure 5: Aerial Image of proposed turn-around area (TA-5) between Structure Nos. P97 and P98.



Photograph 1a: Proposed temporary turn-around area (TA-1), facing southwest.



Photograph 1b: Proposed temporary turn-around area (TA-1), facing south.



Photograph 2: Proposed temporary turn-around area (TA-2), facing southeast.



Photograph 3: Proposed temporary turn-around area (TA-3), facing south.



Photograph 4: Proposed temporary turn-around area (TA-4), facing northeast.



Photograph 5: Proposed temporary turn-around area (TA-5), facing northwest.

Environmental Impact:

Utilization of the new proposed temporary turn-around areas 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 new regulatory consultation. Additionally, utilization of the new proposed temporary turn-around areas occur mostly within existing non-approved project access roads and would incur temporary impacts of 1,315 square feet to bare ground habitat (TA-4), 1,655 square feet (860, 525, and 270 square feet respectively) to bare ground and disturbed habitat (TA-1, TA-3, and TA-4), and 450 square feet to non-native grassland habitat (TA-2). Specific discussions for each resource area are provided below.

Concurrence:

The new proposed temporary turn-around areas are located along existing access roads, some of which (TA-1 through TA-3) are within the County of San Diego Simon Preserve. The local supervising park ranger representing the Simon Preserve has approved these areas for temporary use for project related vehicles. The remaining proposed new temporary turn-around areas are located on private lands. The private land owners have also approved SDG&E's utilization of the new turn-around areas. No additional concurrence is required for the proposed MPR.

Resources:

Biological No Resources Present Resources Present N/A	
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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 (refer to the TL 637 PTC Application, Volume II of II, Appendix 4.4-A). These resources were also discussed within the CPUC-conducted CEQA review process (refer to the TL 637 Final IS/MND). The new proposed temporary turn-around areas (TA-1, TA-2, TA-3, TA-4, TA-5) have been re-evaluated for biological resources. No sensitive biological resources were observed during the field visit to these proposed turn-around areas. Minor vegetation trimming would be required at TA-2 and no ground-breaking activities would occur at any of the turn-around areas. As such, no significant impacts to biological resources are anticipated to occur as a result of the proposed temporary turn-around areas. See below for discussion with respect to each turn-around area.

The impact area for TA-1 occurs within approximately 860 square feet of bare ground and disturbed habitat within an existing maintained dirt road. No vegetation trimming is anticipated to occur; therefore, no significant impacts to biological resources are anticipated to occur as a result of the proposed activities.

The impact area for TA-2 occurs within non-native grassland habitat and would result in temporary impacts to approximately 850 feet of non-native grassland habitat. No groundbreaking activities including blading or grubbing is proposed; therefore temporary impacts to non-native grassland habitat would be expected to be fully restored through natural recruitment without additional enhancement measures.

The impact area for TA-3 occurs within bare ground and disturbed habitat within an existing dirt road. No vegetation trimming is anticipated to occur; therefore, no significant impacts to biological resources are anticipated to occur as a result of the proposed activities.

The impact area for TA-4 occurs within bare ground within an existing maintained dirt road and would result in approximately 1,315 square feet of temporary impacts to bare ground habitat. No vegetation trimming is anticipated to occur; therefore, no impacts to sensitive biological resources are anticipated to occur as a result of the proposed activities.

The impact area for TA-5 occurs within bare ground and disturbed habitat located within an existing dirt road and would result in approximately 270 square feet of temporary impacts. No vegetation trimming is anticipated to occur; therefore, no impacts to sensitive biological resources are anticipated to occur as a result of the proposed activities.

Attachment A contains maps showing resources (cultural, biological, and aquatic) within the vicinity of the proposed temporary turn-around areas. There are cultural and paleontological resources present within the area. There are no aquatic resources present within the area of TA-2, TA-3 and TA-5. See below for discussion of Aquatic Resources with respect to TA-1 and TA-4.

Aquatic Resources:

The proposed temporary turn-around area at TA-1 spans (via a 20-inch culvert) an ephemeral drainage that is likely considered jurisdiction by Federal and State aquatic resource agencies. The drainage flows southeast into an unnamed tributary of San Vicente Creek, which flows into the San Diego River and ultimately, the Pacific Ocean (a traditionally navigable waterway). As the stream course is culverted beneath the road, the proposed uses for TA-1 will not likely directly impact any jurisdictional waters. Regardless, the following avoidance and minimization measures (which are already being used on the project where aquatic resources are present) will reduce the potential for jurisdictional impacts:

- Install and maintain Best Management Practices (BMPs) between upstream and downstream segments of drainage and road.
- Install and maintain high visibility Environmentally Sensitive Area (ESA) fencing along either side of road near drainage.

The proposed temporary turn-around area TA-4 occurs directly adjacent to a stream that is likely considered jurisdiction by Federal and State aquatic resource agencies. The turn-around area is located near the headwaters of an unnamed tributary of San Vicente creek, which flows into the San Diego River and ultimately, the Pacific Ocean (a traditionally navigable waterway). An investigation into jurisdictional waters within the project right-of-way conducted by RECON in spring of 2014 concluded that flows upstream of the proposed turn-around area were erosional in nature within uplands and, therefore, exempt from jurisdiction. Regardless, a likely jurisdictional ephemeral drainage was observed directly southwest of proposed turn-around area TA-4. The turn-around area is located near the headwaters of the creek and, due to disturbance by road traffic; clear indicators of jurisdiction are obscured. In order to avoid impacts to the downstream jurisdictional drainage, the following avoidance and minimization measures (which are already being used on the project where aquatic resources are present) should be followed:

- No grading within the turn-around area.
- No deposition of fill materials (including soil [native or imported], gravel, etc.) within the proposed turn around area.
- BMPs would be installed and maintained downstream of the turn-around area and would be placed to capture sediment without significantly impeding hydrologic flows.

As designed, the proposed temporary turn-around areas for TA-2, TA-3, and TA-5 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 for these locations.

Cultural	No Resources Present	Resources Present	Within Project Component
Cultural	N/A (paved/graveled area	or no ground disturbance)	

Previous Cultural Survey 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 (refer to the 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 (refer to the TL 637 Final MND).

[REDACTED]

The new temporary turn-around areas for TA-1, TA-2, TA-3, TA-4 and TA-5 do not occur within the immediate vicinity of sensitive paleontological formations that may contain fossils. Regardless, no groundbreaking activities are proposed that would potentially impact paleontological resources, if present. As such, a paleontological monitor would not be required for utilization of the proposed temporary turn-around areas. No impacts to paleontological resources are anticipated to occur as a result of the proposed activities.

Disturbance Acreage Changes?	🖂 Yes	No
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Original Disturbance Acreage:

As the proposed temporary turn-around areas (TA-1, TA-2, TA-3, TA-4 and TA-5) were not included as temporary workspaces areas within the PEA or Final IS/MND for TL 637, there is no original disturbance acreage that would be applicable.

New Disturbance Acreage:

The proposed new temporary turn-around areas for TA-1, TA-2, TA-3, TA-4 and TA-5 are anticipated to result in a combined disturbance area of approximately 3,820 square feet (refer to Table 1). Approximately 2,970 square feet of this disturbance area would occur within bare ground and disturbed habitat within existing non-approved access roads and 850 square feet would occur within non-native grassland habitat directly adjacent to an existing project approved access road. No groundbreaking activities are proposed and vegetation trimming would only occur at TA-2. Utilization of turn-around areas TA-1 through TA-5 is not anticipated to cause the Project to exceed anticipated total impacts areas. This is due to the fact that a number of anticipated impact areas (such as staging yards and stringing sites) have been reduced in size from what was originally anticipated, analyzed, and disclosed.

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	Utilization of the proposed temporary turn-around areas (TA-1 through TA-5) would not affect any of the CEQA criterion relating to geology, soils, or seismicity. No ground disturbance work would be required in order to utilize the area. Site preparation would consist of vegetation trimming/mowing (TA-2 only) within the footprint of proposed activities; vegetation trimming will not be to bare ground. The turn-around areas would be utilized in a similar manner as other turn-around areas included as part of the TL 637 Project. Applicable APMs relating to geology, soils, and seismicity would be applied to the use of these turn-around areas and would not be required to be altered or otherwise changed in order to ensure that new no impacts would result. When the turn-around areas are no longer needed for construction activities, the disturbed area will be restored, as needed and as appropriate, to approximate pre-construction conditions. There are no blading or grubbing activities proposed for the area around TA-2; therefore temporary impacts to grassland habitat would be expected to be fully restored through natural recruitment without additional enhancement measures.
Agency Consultation?	Y N	Utilization of the proposed turn-around areas TA-1 through TA-5 would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	□ Y ⊠ N	Utilization of the proposed temporary turn-around areas (TA-1 through TA-5) 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 new turn-around areas TA-1 through TA-5 will reduce potential hazards for the Project by ensuring all access roads will be clear in the event of an emergency and by allowing head-on vehicle traffic to safely pass one another along the access road to Structure No. P24 (TA-2). Project Applicable design standards, applicable APMs, and mitigation measures relating to hazards and hazardous materials would be applicable to the new turn-around areas TA-1 through TA-5 and would not be required to be altered, expanded, or otherwise changed in order to ensure that no impacts would

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.	
		result.	
Agency Consultation?	□ Y ⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) would not require agency consultation relating to hazards or hazardous materials.	
Hydrology	□ Y ⊠ N	Utilization of the proposed temporary turn-around areas (TA-1 through TA-5) would not affect hydrology and water quality in a manner different from the impacts assessed as part of the CEQA review process. Appropriate stormwater BMPs are installed and maintained throughout the proposed construction activities, including during utilization of the proposed temporary turn-around areas (TA-1 through TA-5).	
Agency Consultation?	□ Y⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) 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 new temporary turn-around areas (TA-1 through TA-5) have been surveyed for potential resources by an archaeologist and no resources were identified. The new temporary turn-around areas at TA-1 and TA-2 occur within the boundaries of an identified sensitive cultural resource. TA-1 will be spot-checked prior to utilization, and TA-2 will be resurveyed by a Cultural Resource Monitor after vegetation trimming activities. No cultural resources were identified in the vicinity of the proposed temporary turn-around areas at TA-3 through TA-5.	
		The new temporary turn-around areas for TA-1, TA-2, TA-3, TA-4 and TA-5 do not occur within the vicinity of sensitive paleontological formations that may contain fossils. Regardless, no groundbreaking activities are proposed that would potentially impact paleontological resources, if present. As such, a paleontological monitor would not be required for utilization of the proposed temporary turn-around areas. 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 resources to a level less than significant. No agency or tribal consultation would be required.	
Traffic and Circulation	□ Y ⊠ N	Utilizing the proposed temporary turn-around areas (TA-1 through TA-5) would not affect traffic and circulation in a manner different from the impacts assessed as part of the CEQA review process. The proposed temporary turn-around areas would be constructed using construction crews and equipment that are already present on the project. No new traffic on public roadways would be generated.	
Agency Consultation?	□ Y ⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) 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 proposed temporary turn-around areas (TA-1 through TA-5) would be established utilizing construction crews and equipment that are already active on the TL 637 project. Any change in the anticipated air emissions would be negligible as the only increase in use of equipment would be utilizing a weed wacker to trim the vegetation at TA-2. No ground disturbance activities will occur during utilization of any of the temporary turn-around areas.
Agency Consultation?	□ Y ⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) would not require agency consultation relating to air quality.
Noise and Vibration	∏ Y⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) are not located near noise sensitive areas. No new or altered APMs or mitigation measures would be required.
Agency Consultation?	□ Y ⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) 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 temporary turn-around areas (TA-1 through TA-5). Temporary impacts would not differ from those analyzed and disclosed within the CEQA review process.
Agency Consultation?	□ Y ⊠ N	The temporary turn-around areas (TA-1 through TA-5) 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 temporary turn-around areas (TA-1 through TA-5). No sensitive biological resources were observed during the field visit to these locations.
		The proposed temporary impact areas occur within bare ground and disturbed habitat (within existing non-approved access roads), and non-native grassland habitat located directly adjacent to an existing project approved access road. The total temporary impact area for all five of the proposed temporary turn-around areas is approximately 3,820 square feet (refer to Table 1). Approximately 2,970 square feet of this temporary impact area would occur within bare ground and disturbed habitat within existing non-approved access roads and 850 square feet would occur within non-native grassland habitat.
		The temporary impact area for TA-1 occurs within approximately 860 square feet of bare ground and disturbed habitat. Disturbed habitat within the proposed work area is dominated by filaree (<i>Erodium</i> sp.).
		The temporary impact area for TA-2 occurs within non-native grassland habitat dominated by wild oat (<i>Avena fatua</i>) and would result in temporary impacts to approximately 850 feet of grassland habitat.
		The temporary impact area for TA-3 occurs within approximately 525 square feet of bare ground and disturbed habitat. Disturbed habitat within the proposed work area is dominated by filaree.
		The temporary impact area for TA-4 occurs within bare ground within an existing maintained dirt road and would result in approximately 1,315 square feet of

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.
		temporary impacts to bare ground. Construction crews would comply with SDG&E's NCCP operational protocols and avoid parking beneath the drip line of a coast live oak (<i>Quercus agrifolia</i>) located immediately west of the proposed turnaround area
		The temporary impact area for TA-5 occurs within bare ground and disturbed habitat located within an existing dirt road and would result in approximately 270 square feet of temporary impacts. Disturbed habitat within the proposed temporary impact area is dominated by filaree.
		Vegetation trimming/mowing within the footprint of proposed activities will be required at TA-2 only. 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. No blading or grubbing is proposed; therefore temporary impacts to grassland habitat would be expected to be fully restored through natural recruitment without additional enhancement measures. No groundbreaking activities will occur at any of the proposed temporary turn-around areas. No vegetation trimming is anticipated to occur at TA-1, TA-3, TA-4 or TA-5; therefore, no impacts to sensitive biological resources are anticipated to occur as a result of the proposed activities.
Agency Consultation?	□ Y ⊠ N	The proposed temporary turn-around areas (TA-1 through TA-5) would not require agency consultation relating to vegetation, wildlife, or other biological resources.

Resource Agency Coordination / Approvals				
Resource Agency	Date	Name (print)	Signature	
N/A				Reviewed
				 Approved Approved with Conditions (see below) Denied

For CPUC Compliance Manager Use Only				
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