



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

Date Requested:	June 25, 2014	Report #:	012
Date Approved:	July 1, 2014	Approval Agency:	No other agency approval is required.
Property Owner(s):	Private and SDG&E Right-of-Way (ROW).	Location/Milepost:	SS-15A, SS-15B (near P105) and anchor block near P102
Land Use/Vegetative Cover:	The proposed impact area occurs within disturbed coastal sage scrub habitat.	Sensitive Resources:	Sensitive habitats including native species within disturbed coastal sage scrub.
Refinement / Modification From (check all that apply):			
<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input checked="" type="checkbox"/> Other: Stringing Site Modifications			
<p>San Diego Gas & Electric Company (SDG&E) is proposing the following activities that were not 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): (1) utilize two new additional temporary workspace areas, Stringing Site No. 15A (SS-15A) and SS-15B, located near Structure No. P105; and (2) temporarily place a block anchor within a new temporary workspace area located to the west of Structure No. P102. All proposed refinements are summarized within Table 1 and depicted on Figures 2a and 2b below.</p>			
Description of Refinement			
<p>SDG&E proposes to utilize new additional temporary workspace areas near P105 (SS-15A and SS-15B) and temporarily place a block anchor near Structure No. P102 in order to safely and successfully conduct stringing activities. The proposed two additional temporary workspace areas (SS-15A and SS-15B) required for stringing activities are located directly adjacent to the existing main access road near Structure No. P105. The proposed temporary installation of a block anchor occurs off the existing main access road, west of Structure No. P102. Access to all the proposed temporary workspace areas will be from existing approved project access roads.</p> <p>The new SS-15A area is a rectangular shape located adjacent to the main access road west of Structure No. P105 and will result in approximately 1,840 square feet of temporary impacts to disturbed coastal sage scrub habitat. The new SS-15B area is also a rectangular shape adjacent to the main access road east of Structure No. P105 and will result in approximately 1,050 square feet of temporary impacts to disturbed coastal sage scrub habitat. The location for the placement of a block anchor occurs approximately 60 feet west of Structure No. P102 on the north side of the main access road and will result in 36 square feet of temporary impacts to disturbed coastal sage scrub habitat. For a summary of the temporary workspace areas described, see Table 1. The three proposed temporary workspace areas would result in a combined 2,926 square feet of temporary impacts.</p> <p>Figure 2a depicts the proposed new temporary workspace areas for SS-15A and SS-15B near Structure No. P105. Figure 2b depicts the proposed new temporary workspace area required for the installation of a block anchor near Structure No. P102. Photograph Nos. 1 and 2 depict the proposed new temporary workspace at SS-15A and SS-15B, respectively. Photograph No. 3 depicts the proposed new location for the installation of a block anchor near Structure No. P102.</p>			

Original Condition:

The new proposed temporary workspace areas occur off of the existing approved project access road in locations that were not identified as a temporary workspace areas within the PTC Application (PEA) or Final IS/MND for the TL 637 Project.

Justification for Change:

Following in-field review of the stringing sites, construction crews identified potential logistical concerns and determined that additional sites and minor modifications were required to safely and successfully conduct stringing activities. These sites and/or modifications include the new SS-15A and SS-15B temporary workspace areas and the temporary workspace area required for the temporary installation of a block anchor near Structure No. P102, as the areas are more conducive to the proposed work.

Tables

Table 1. Summary of Proposed Refinements and Corresponding Temporary Impact Areas

Feature	Temporary Impact Area	Existing Conditions	Reference
SS-15A	1,840 square feet	Disturbed coastal sage habitat	Figure 2a; Photograph No. 1
SS-15B	1,050 square feet	Disturbed coastal sage habitat	Figure 2a; Photographs No. 2
Block Anchor near P102	36 square feet	Disturbed coastal sage habitat	Figure 2b; Photograph No. 3

Maps and Figures

Figure 1 (extracted from PEA Appendix 3-B, Sheets 26 and 27 of 55) depicts the original Project features (as included within the PEA and PTC) in the vicinity of the proposed new temporary work areas that constitute this MPR request (SS-15A, SS-15B, and new anchor block). The proposed new work areas (stringing sites and anchor block) are located near proposed Structure Nos. P105 and P102, respectively. Figure 2a depicts the proposed new temporary workspace areas for SS-15A and SS-15B near Structure No. P105 and Figure 2b depicts the proposed new temporary workspace area for the installation of a block anchor near Structure No. P102.



Figure 1: Overview Map showing the Project area (as included within the PEA and PTC) near Structure No. P105 in the vicinity of the proposed locations for SS-15A and SS-15B, left figure, and area near Structure No. P102, where the proposed block anchor would be installed, right figure. The existing approved project access road is shown as a dashed red line, and footpath access as a yellow and black line.

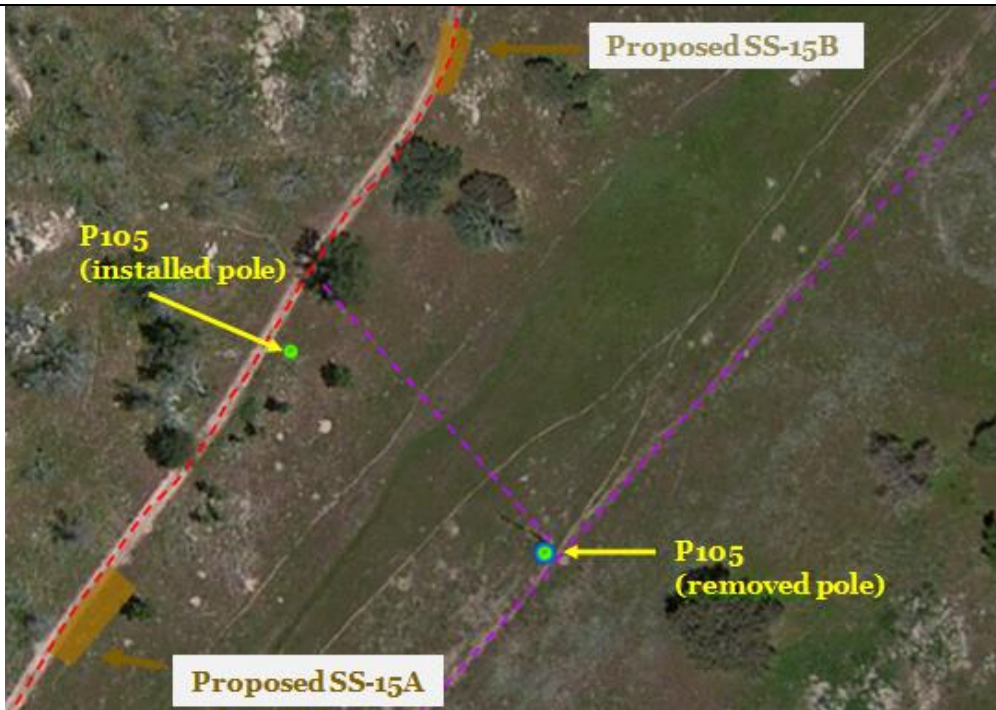


Figure 2a: Aerial image of proposed Stringing Site Nos. 15A and 15B.



Figure 2b: Aerial image of proposed temporary workspace area for the installation of a block anchor near Structure No. P102.



Photograph 1: Proposed SS-15A temporary workspace area (outlined in brown), facing southeast.



Photograph 2: Proposed SS-15B temporary workspace area (outlined in brown) facing east.



Photograph 3: Proposed block anchor location (wooden stake) to be surrounded by an approximately 36 square foot temporary workspace area (not shown) near Structure No. P102 (in background), facing east.

Environmental Impact:

Utilization of the new proposed temporary workspace areas for SS-15A, SS-15B and the block anchor installation near Structure No. P102 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 the additional stringing sites (SS-15A and SS-15B) and the block anchor installation near Structure No. P102 are located on private property. The property owner has approved the proposed construction modifications. No additional concurrence is required for the proposed MPR.

Resources:

Biological	<input type="checkbox"/> No Resources Present	<input checked="" type="checkbox"/> Resources Present	<input type="checkbox"/> 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 (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-15A, SS-15B and the Structure No. P102 block anchor have been re-evaluated for biological resources. The proposed impact areas occur within native and non-native vegetation including disturbed coastal sage scrub habitat. No significant impacts to biological resources are anticipated to occur as a result of the proposed modifications 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-15A, SS-15B, and the Structure No. P102 block anchor temporary workspace areas.

Aquatic Resources:

As designed, the proposed additional stringing sites (SS-15A and SS-15B) and the Structure No. P102 block anchor will avoid direct impacts to 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	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> Within Project Component
	<input type="checkbox"/> 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 (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 cultural resources. 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 surveyed on June 18, 2014 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 temporary workspace areas described above. No impacts to paleontological resources are anticipated to occur.

Disturbance Acreage Changes?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Original Disturbance Acreage:

The proposed temporary workspace areas were not included as approved temporary workspace areas within the PTC application and PEA or the Final IS/MND for the TL 637 Project. Therefore, there is no original disturbance acreage that would be applicable.

New Disturbance Acreage:

The new proposed temporary workspace areas for SS-15A and SS-15B are anticipated to result in a disturbance area of approximately 2,890 square feet. The proposed new temporary workspace area for the Structure No. P102 block anchor is anticipated to result in a disturbance area of approximately 36 square feet (6 feet long by 6 feet wide). This would result in a total disturbance area of approximately 2,926 square feet due to the proposed activities. Refer to Figure 2a and 2b for the location of disturbance areas and Table 1 for a summary of the temporary impacts.

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	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>The new proposed temporary workspace areas for the additional stringing sites (SS-15A and SS-15B) and the Structure No. P102 block anchor would not affect any of the CEQA criterion relating to geology, soils, or seismicity. No grading, blading, grubbing or dirt work would be required to establish the additional stringing sites and temporary workspace area.</p> <p>Site preparation would consist of vegetation trimming and/or mowing within the footprint of proposed 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. Additionally, large rocks located within the proposed stringing sites may be relocated nearby if required.</p> <p>The additional temporary workspace areas required for stringing activities would be designed and constructed in a similar manner as other similar features 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 temporary workspace areas and would not be required to be altered, expanded, or otherwise changed in order to ensure that no new impacts would result. When the temporary workspace areas are no longer needed for construction activities, the disturbed area will be restored, as needed and as appropriate, to approximate pre-construction conditions.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>The new proposed temporary workspace areas would not require agency consultation relating to geology, soils, or seismicity.</p>
Hazardous Materials and Waste	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Utilization of the new proposed temporary stringing sites (SS-15A and SS-15B) and Structure No. P102 block anchor 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. Applicable project design standards, APMs, and mitigation measures relating to hazards and hazardous materials would be implemented for the additional temporary workspace areas and would not be required to be altered, expanded, or otherwise changed in order to ensure that no impacts would result.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>The new proposed temporary workspace areas would not require agency consultation relating to hazards or hazardous materials.</p>
Hydrology	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Utilization of the new proposed temporary workspace areas for the additional stringing sites (SS-15A and SS-15B) and the Structure No. P102 block anchor 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 additional temporary workspace areas described above. 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. Appropriate BMPs will be installed around the proposed work areas as necessary, consistent with existing APMs, mitigation measures, and project SWPPP.</p>

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.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas would not require agency consultation relating to hydrology or water quality.
Cultural Resources	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	No impacts to cultural resources are anticipated to occur as a result of the proposed activities. The proposed temporary workspace areas have been re-surveyed for potential resources by an approved archaeological monitor on June 18, 2014 and no cultural materials were encountered within the area. No impacts to paleontological resources are anticipated to occur as a result the proposed activities. No further mitigation measures are recommended and no monitoring would be required to utilize the modified temporary workspace areas described above. None of the temporary workspace areas occur in the vicinity of known sensitive cultural resources.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Utilizing the new proposed temporary workspace areas for the additional stringing sites (SS-15A and SS-15B) and the Structure No. P102 block anchor would not affect traffic and circulation in a manner different from the impacts assessed as part of the CEQA review process. The additional temporary workspace 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?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas would not require agency consultation relating to traffic and circulation.
Air Quality	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas for the additional stringing sites (SS-15A and SS-15B) and the Structure No. P102 block anchor would be established utilizing construction crews and equipment that are already active on the TL 637 project and the stringing activities would be similar to those originally proposed. Any change in the anticipated air emissions would be negligible as the use of equipment to conduct stringing activities would not increase but rather would be spread out over multiple sites (SS-15, SS-15A and SS-15B). The increase in emissions, if any, 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?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas would not require agency consultation relating to air quality.

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.
Noise and Vibration	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas for the additional stringing sites (SS-15A and SS-15B) and the Structure No. P102 block anchor are not located near noise sensitive areas. Resulting noise emissions would be similar to those disclosed within the CEQA review process and no new or altered APMs or mitigation measures would be required. Therefore, impacts would be similar to those disclosed within the CEQA review process with no anticipated change in severity.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas would not require agency consultation relating to noise and vibration.
Visual Resources	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	No permanent change in impacts to visual resources would result from the utilization of the additional temporary workspace areas at SS-15A, SS-15B, and Structure No. P102. Temporary impacts would remain similar to those analyzed and disclosed within the CEQA review process.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new temporary workspace areas described above would not require agency consultation relating to visual resources.
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>No significant impacts to biological resources are anticipated to occur as a result of the new proposed temporary workspace areas for the modified stringing sites (SS-15A and SS-15B), and the Structure No. P102 block anchor. Vegetation trimming/mowing within the footprint of the above listed activities would be required. All 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.</p> <p>The proposed SS-15A and SS-15B workspace areas will result in approximately 2,890 square feet of temporary impacts to disturbed coastal sage scrub. The habitat is grazed by domestic livestock present on the property. Anticipated temporary impacts would include both native and non-native vegetation. Disturbed coastal sage scrub habitat within the proposed area is dominated by native species that include California buckwheat (<i>Eriogonum fasciculatum</i>), matchweed (<i>Gutierrezia californica</i>), Stephanomeria sp., Pectocarya sp., Common sandaster (<i>Corethrogyne filaginifolia</i>), Clustered Tarweed (<i>Deinandra fasciculata</i>) and non-native species that include red brome (<i>Bromus madritensis</i>), red stem filaree (<i>Erodium cicutarium</i>), and shortpod mustard (<i>Hirschfeldia incana</i>). No sensitive biological resources, including nesting birds or listed species, were observed during the field visit.</p> <p>The proposed block anchor will result in approximately 36 square feet temporary impacts to disturbed coastal sage scrub habitat. The area is characterized by red stem filaree, ripgut brome (<i>Bromus diandrus</i>), red brome, and oat grass (<i>Avena sp.</i>).</p> <p>No significant impacts to sensitive biological resources are anticipated as a result of the proposed work and temporary impacts would be similar to those previously disclosed and anticipated within the CEQA review process. All impacts to sensitive habitats will be documented in the Post Construction Report as per the <i>SDG&E Natural Community Conservation Plan</i> (APM BIO-1).</p>

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.
		<p>No blading or grubbing is proposed; therefore impacts to disturbed coastal sage scrub habitat would be temporary and would be expected to be fully restored through natural recruitment, without additional enhancement measures, consistent with APM BIO-1.</p> <p>Aquatic Resources:</p> <p>As designed, the proposed stringing sites will avoid Federal and State jurisdictional waters and other aquatic resources in the area and no impacts to aquatic resources would occur. No additional minimization measures or aquatic resource monitoring would be required beyond what was included within the TL 637 Final MND.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas described above 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				<input type="checkbox"/> Reviewed
CPUC Project Manager				<input type="checkbox"/> Approved <input type="checkbox"/> Approved with Conditions (see below) <input type="checkbox"/> Denied

For CPUC Compliance Manager Use Only		
<input checked="" type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied	<input type="checkbox"/> 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