



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

Date Requested:	July 07, 2014	Report #:	013
Date Approved:	July 9, 2014	Approval Agency:	No other agency approval is required.
Property Owner(s):	Private and SDG&E Right-of-Way (ROW).	Location/Milepost:	SS-17, SS-17A, SS-17B and SS-18
Land Use/ Vegetative Cover:	The proposed impact area occurs within non-native grassland habitat and bare ground	Sensitive Resources:	Non-native grassland habitat within the understory of oak savannah habitat

Refinement / Modification From (check all that apply):

- Permit
 Plan/Procedure
 Specification
 Drawing
 Mitigation Measure (MM)

Other: Stringing Site Modifications

San Diego Gas & Electric Company (SDG&E) is proposing to utilize a different temporary workspace for Stringing Site Nos. 17 and 18 (SS-17 and SS-18), located near Structure No. P123, 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 Figures 1a and 1b and refer to MND Attachment A). Additionally, SDG&E proposes to utilize two additional stringing locations (referred to as SS-17A and SS-17B) between Structure Nos. P123 and P124 not described within the PTC, PEA, or IS/MND. Figure 1 depicts the originally approved SS-17 and SS-18. All proposed refinements are summarized within Table 1 and depicted on Figures 2, 3 and 4 below.

Description of Refinement

SDG&E proposes to use a different temporary workspace area for both SS-17 and SS-18, and utilize additional temporary workspace areas near SS-17 (SS-17A and SS-17B) in order to safely and successfully conduct stringing activities. The proposed refinement would shift SS-17 out of the existing main access road and adjacent to an approved secondary access road, as well as change the shape of the stringing site. The proposed refinement would shift SS-18 to partially transverse the main access road near the existing SS-18 location, as well as change the shape. Both the proposed SS-17 and SS-18 sites will replace the originally proposed locations. The proposed two additional temporary workspace areas required for stringing activities are located directly adjacent to the existing main access road northeast of Structure No. P123 (SS-17A and SS-17B). The proposed temporary workspace areas are further described below.

The modified SS-17 area is an irregularly shaped rectangle approximately 90 feet in length with a variable width between 30 to 65 feet that will result in approximately 4,100 square feet of temporary impacts to non-native grassland and bare ground. The modified SS-18 area is a trapezoidal shape that transverses the main access road and will result in approximately 2,000 square feet of temporary impacts to non-native grassland. The new SS-17A location is within an irregularly shaped rectangle area located east of Structure No. P123 on the north side of the access road and will result in approximately 960 square feet of temporary impacts to non-native grassland habitat. The new SS-17B location is within an irregularly shaped rectangle area and will result in 480 square feet to non-native grassland habitat. For a summary of the temporary workspaces described, see Table 1 below.

Figure 2 depicts the proposed new temporary workspace area for SS-17, and the original SS-17 workspace. Figure 3

depicts the proposed new temporary workspace areas for SS-17A and SS-17B. Figure 4 depicts the proposed new temporary workspace area for SS-18, and the original SS-18 workspace. Photograph Nos. 1, 2 and 3 depict the proposed new temporary workspace area for SS-17, SS-17A and SS-17B, and SS-18, respectively.

Original Condition:

SS-17 and SS-18 were originally planned to be located within two discrete 14 foot by 150 foot areas located entirely within the existing approved project access road (refer to Figure 1a and 1b). SS-17A and SS-17B are new additional workspaces required for stringing activities that were not included as part of the Project as originally proposed.

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-17 and SS-18 (refer to Figures 2 and 4), and determined that additional temporary workspace areas (SS-17A and SS-17B) are required to complete stringing activities. The modified SS-17 and SS-18 and new SS-17A and SS-17B temporary workspace areas are advantageous over using the existing SS-17 and SS-18 locations because the areas are more conducive to the proposed work activities and the new locations will maintain clear access roads in the event of an emergency.

Tables

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

Feature	Temporary Impact Area	Existing Conditions	Reference
SS-17	4,100 square feet	Non-native grassland habitat and bare ground	Figure 2; Photographs Nos. 1 and 2
SS-18	2,000 square feet	Non-native grassland habitat and bare ground	Figure 4; Photograph Nos. 3
SS-17A	960 square feet	Non-native grassland habitat	Figure 3; Photograph No. 2
SS-17b	480 square feet	Non-native grassland habitat	Figure 3; Photograph No. 2

Maps and Figures

Figures 1a and 1b (extracted from PEA Appendix 3-B, Sheet 35 of 50 and 44 of 55 respectively) depicts the originally proposed temporary workspace areas for Stringing Site Nos. 17 and 18. Figures 2, 3 and 4 depict the proposed new temporary workspace areas for SS-17, SS-17A and SS-17B, and SS-18, respectively. Photograph Nos. 1, 2 and 3 show the existing conditions and proposed new temporary workspace boundaries for SS-17, SS-17a and SS-17B, and SS-18, respectively.



Figure 1a: MPR Overview Map showing the original stringing site location (SS-17), adjacent pole locations, and the existing approved Project access roads (dashed red lines).

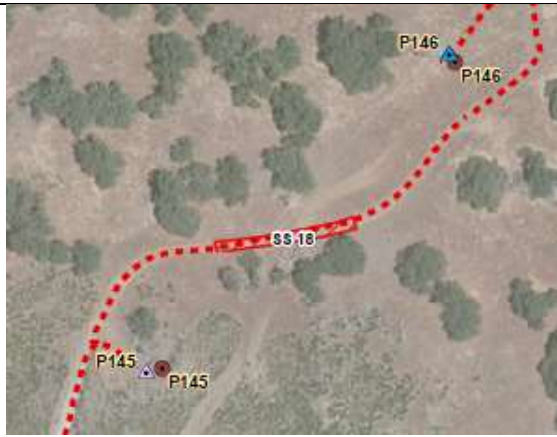


Figure 1b: MPR Overview Map showing the original stringing site locations (SS-18), adjacent pole locations, and the existing Project-approved access road (dashed red line).



Figure 2: Aerial image of proposed Stringing Site No. 17 located southwest of Structure No. P123.



Figure 3: Aerial image of proposed Stringing Site Nos. 17A and 17B, located between Structure Nos. P123 and P124.

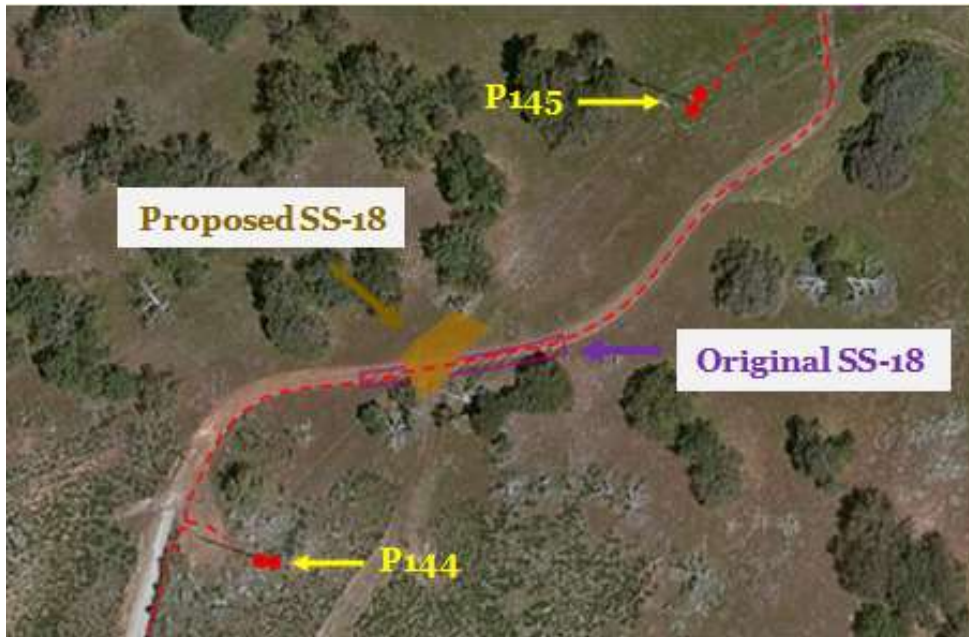


Figure 4: Aerial image of proposed Stringing Site No. 18, located between Structure Nos. P144 and P145.



Photograph 1: Proposed SS-17 temporary workspace area (outlined in brown), facing east.



Photograph 2: Proposed SS-17A and SS-17B temporary workspace areas (outlined in brown), facing west.



Photograph 3: Proposed SS-18 temporary workspace area (outline in brown), facing east.

Environmental Impact:

Utilization of the new proposed temporary workspace areas for SS-17 and SS-18 in place of the originally identified stringing site areas, as well as utilization of the proposed additional temporary workspace areas at SS-17A and SS-17B 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 modified stringing sites (SS-17 and SS-18), and the additional stringing sites (SS-17A and SS-17B) 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-17 and SS-18 as well as the additional temporary workspace areas for SS-17A and SS-17B have been re-evaluated for biological resources. The proposed impact areas occur within non-native grassland habitat within the understory of oak savannah habitat, and bare ground. 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. Overall impacts to biological resources will increase due to the addition in overall temporary impact area (addition of approximately 3,440 square feet).

Attachment A contains maps showing known resources (cultural, biological, and aquatic) within the vicinity of the proposed SS-17 and SS-18 modifications and the proposed additional workspace at SS-17A and SS-17B.

Aquatic Resources:

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	<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 re-surveyed on June 22, 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 previously contemplated temporary workspace areas for SS-17 and SS-18 would have resulted in a total disturbance area of approximately 4,200 square feet (14 feet wide by 150 feet long for both locations) (refer to Figure 1a, 1b, 2 and 4).

New Disturbance Acreage:

The proposed new temporary workspace area for SS-17 is anticipated to result in a disturbance area of approximately 4,100 square feet (approximately 90 feet long by 30-60 feet wide). The proposed new temporary workspace area for SS-17A is anticipated to result in a disturbance area of approximately 960 square feet. The proposed new temporary workspace area for SS-17B is anticipated to result in a disturbance area of approximately 480 square feet. The proposed new temporary workspace area for SS-18 is anticipated to result in a disturbance area of approximately 2,000 square feet. In total, a new disturbance area of approximately 7,540 square feet would result. This represents an additional disturbance area of approximately 3,340 square feet when compared to the originally contemplated disturbance area for SS-17 and SS-18. Refer to Figure 2, 3 and 4 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 modified stringing sites (SS-17 and SS-18) additional stringing sites (SS-17A and SS-17B) would not affect any of the CEQA criterion relating to geology, soils, or seismicity. No additional 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	The new proposed temporary workspace areas would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Utilization of the new proposed temporary workspace areas for the modified stringing sites (SS-17 and SS-18) and additional stringing sites (SS-17A and SS-17B) 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-17 and SS-18, as well as the additional SS-17A and SS-17B 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 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.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas would not require agency consultation relating to hazards or hazardous materials.
Hydrology	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Utilization of the new proposed temporary workspace areas for the modified stringing sites (SS-17 and SS-18) and additional stringing sites (SS-17A and SS-17B) 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.

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 22, 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 and mitigation measures 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 modified stringing sites (SS-17 and SS-18) and additional stringing sites (SS-17A and SS-17B) 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 modified stringing sites (SS-17 and SS-18) and additional stringing sites (SS-17A and SS-17B) 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-17, SS-17A, SS-17B and SS-18). The increase in emissions, if any, would be sufficiently minor such that any increase in emissions would not result in significant impacts (exceedance 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.
Noise and Vibration	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas for the modified stringing sites (SS-17 and SS-18) and additional stringing sites (SS-17A and SS-17B) 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.
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.

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.
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 new proposed temporary workspace areas for the modified stringing sites (SS-17 and SS-18) and additional stringing sites (SS-17A and SS-17B). 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 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-17 and SS-18) and additional stringing sites (SS-17A and SS-17B). 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>SS-17, SS-17A & SS-17B</p> <p>The proposed SS-17, SS-17A, and SS-17B workspace areas will result in approximately 5,540 square feet of temporary impacts to the non-native grassland within the understory of oak savannah habitat. The habitat is heavily grazed and disturbed by domestic livestock present on the property. Anticipated temporary impacts would include both native and non-native vegetation. Grassland habitat within the proposed area is dominated by native plant species including California Buckwheat (<i>Eriogonum fasciculatum</i>), Clustered Tarweed (<i>Deinandra fasciculata</i>), and Doveweed (<i>Croton setiger</i>) and non-native species including red-stem filaree (<i>Erodium cicutarium</i>), ripgut brome, soft brome (<i>Bromus hordeaceus</i>) and shortpod mustard (<i>Hirschfeldia incana</i>). Approximately 3,440 square feet of temporary impacts to sensitive habitat will be added by utilizing the proposed SS-17, SS-17A, and SS-17B instead of the originally contemplated area (SS-17). No sensitive biological resources were observed during the field visit. One active mourning dove nest (Nest ID 344156) is approximately 60-65 feet from SS-17 but is visually screened by the host tree and no impacts are anticipated. Construction activities would be monitored by an approved biological resources monitor, consistent with exiting APMs and mitigation measures.</p> <p>SS-18</p> <p>The proposed modification to SS-18 will result in approximately 2,000 square feet of temporary impacts to the non-native grassland within the understory of oak savannah habitat. The habitat is heavily grazed and disturbed by domestic livestock present on the property. Anticipated temporary impacts would include non-native vegetation. Non-native grassland habitat within the proposed area is dominated by Medusa head (<i>Elymus caput-medusae</i>), red-stem filaree, ripgut brome, soft brome, and slender wild oat (<i>Avena barbata</i>). Approximately 2,000 square feet of temporary impacts to sensitive habitat will be added by utilizing the proposed SS-18 instead of the originally contemplated area. No sensitive biological resources, including nesting birds were observed during the field visit.</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>Summary</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> <p>No blading or grubbing is proposed; therefore impacts to disturbed non-native grassland 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. A non-jurisdictional swale is located within the proposed modification areas of SS-17A and SS-17B. Federal and State jurisdiction begins approximately 50 feet downstream of the proposed stringing site and it shall be protected from construction related sedimentation via BMPs. A non-jurisdictional erosional feature transverses the proposed SS-18 modification, paralleling the main access road. 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

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