



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

Date Requested:	May 2, 2014	Report #:	005
Date Approved:	May 6, 2014	Approval Agency:	No other agency approval is required.
Property Owner(s):	SDG&E Right-of-Way (ROW)	Location/Milepost:	Stringing Site No. 4
Land Use/Vegetative Cover:	The proposed impact area occurs primarily within non-native grassland.	Sensitive Resources:	Cultural resources and sensitive habitats including non-native grassland.
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 Modification			
San Diego Gas & Electric Company (SDG&E) is proposing to utilize a different temporary workspace for Stringing Site No. 4 (SS-4), located near Structure No. P25 within Simon Preserve (County of San Diego), 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) (refer to MND Attachment A).			
Description of Refinement			
SDG&E proposes to use a different temporary workspace for SS-4 near Structure No. P25 in order to safely and successfully conduct stringing activities. The proposed modification shifts the stringing site off of the existing access road and to the north, changes the shape, and reduces the workspace area required for stringing activities. The modified stringing site area is approximately 30 feet by 60 feet and will result in approximately 1,800 square feet of impacts to non-native grassland habitat. The original SS-4 temporary workspace area would have resulted in approximately 2,100 square feet (14 feet by 150 feet) of temporary impacts.			
Figure 2 depicts the proposed new temporary workspace for SS-4 and the original SS-4 location within the existing access road. Photograph No. 1 depicts the proposed new temporary workspace area for SS-4.			
Original Condition:			
SS-4 was originally planned to be located within a 14 foot by 150 foot area entirely within the existing access road adjacent to Structure No. P25 within Simon Preserve (refer to Figure 1).			
Justification for Change:			
Following in-field review of the stringing site, construction crews identified potential logistical and safety concerns with utilizing the originally planned temporary workspace for SS-4 (refer to Figure 1). The original location of SS-4 is located within the 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 site needs to be moved off the road. The modified SS-4 temporary workspace area is advantageous to using the existing SS-4 location because it is safer to use in the event of an emergency, the area is more conducive to the proposed work activities, and will result in less anticipated temporary impacts.			

Maps and Figures

Figure 1 (extracted from PEA Appendix 3-B, Sheet 4 of 50) depicts the originally proposed temporary workspace area for Stringing Site No. 4. Figure 2 depicts the proposed new temporary workspace area for Stringing Site No. 4 near Structure No. P25.



Figure 1: MPR Overview Map



Figure 2: Aerial image of proposed Stringing Site No. 4 modification.



Photograph 1: View of proposed Stringing Site No. 4 with approximate boundary outlined in yellow, facing northeast.

Environmental Impact:

Utilization of the new proposed temporary workspace area for SS-4 near Structure No. P25 in place of the originally identified stringing site area 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 workspace for SS-4 is anticipated to reduce total temporary impact area for the Project due to the proposed smaller temporary workspace required for stringing activities compared to the originally identified temporary workspace for SS-4. Specific discussions for each resource area are provided below.

Concurrence:

The new proposed temporary workspace area for SS-4 is located adjacent to the original SS-4 location. The modified SS-4 area is smaller in size than the original SS-4 area analyzed in the CEQA review process. No 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 area for SS-4 has been re-evaluated for biological resources. The proposed impact area occurs within non-native grassland 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-4.

Attachment A contains maps showing known resources (cultural, biological, and aquatic) within the vicinity of the proposed SS-4 modification. There are cultural and paleontological resources present within the area. There are no aquatic resources present within the area, as further described below.

Aquatic Resources:

As designed, the proposed stringing site 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 type="checkbox"/> No Resources Present	<input checked="" 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).

The new temporary workspace area for SS-4 occurs within the boundaries of an identified sensitive cultural resource. However, 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 resources were identified on the surface. A cultural monitor will be required for utilization of the modified stringing site during vegetation trimming/mowing activities as required by APM CUL-3. As the modified SS-4 area occurs within the boundaries of a sensitive cultural resource, no groundbreaking activities will occur and ground disturbance will be kept to a minimum.

The new temporary workspace area for SS-4 occurs within the vicinity of sensitive paleontological formations that may contain fossils. However, a paleontological monitor would not be required for utilization of the modified stringing site as there would be no groundbreaking activities. Therefore, no impacts to paleontological resources are anticipated to occur as a result the proposed activities.

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

The previously contemplated temporary workspace area for SS-4 would have resulted in a disturbance area of approximately 2,100 square feet (150 feet long by 14 feet wide) adjacent to Structure No. P25 (refer to Figure 1).

New Disturbance Acreage:

The proposed new temporary workspace area for SS-4 is anticipated to result in a disturbance area of approximately 1,800 square feet (60 feet long by 30 feet wide) as shown in Figure 2. This would result in a reduction in disturbance area of approximately 300 square feet 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	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace area for SS-4 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 within the footprint of proposed activities and the area would be used for parking equipment and for wire pulling activities. The modified stringing site area 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 area 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 area is no longer needed for construction activities, the disturbed area will be restored, as needed and as appropriate, to approximate pre-construction conditions. The area will be raked by laborers in order to prepare for potential hydro-seeding, if required.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace area for SS-4 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 modified SS-4 temporary workspace area 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-4 area 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 SS-4 area 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 area for SS-4 would not require agency consultation relating to hazards or hazardous materials.
Hydrology	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Utilization of the proposed modification to SS-4 in place of the originally planned SS-4 area 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 modification to SS-4.</p> <p>Pre-construction 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.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace areas for SS-4 would not require agency consultation relating to hydrology or water 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.
Cultural Resources	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>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. The existing berm (refer to Photograph No. 1) will be left in place, with vehicles driving over it, to ensure any potential buried resources are avoided. Any construction activities, including vegetation trimming or removal, will be monitored by a qualified archeologist as required by APM CUL-3. While the proposed new SS-4 is located within the boundaries of a documented cultural resource, the originally planned SS-4 located was also located within the boundaries of the same resource (refer to Attachment A). Therefore, impacts would be similar to those disclosed within the CEQA review process and no new or altered APMs or mitigation measures would be required.</p> <p>While the modified SS-4 area occurs in the vicinity of sensitive paleontological formations that may contain fossils, no groundbreaking activities are proposed, and as such, no paleontological monitoring would be required. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the CEQA review process. Therefore, impacts would be similar to those disclosed within the CEQA review process and no new or altered APMs or mitigation measures would be required.</p>
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	Constructing the new proposed temporary workspace area for SS-4 would not affect traffic and circulation in a manner different from the impacts assessed as part of the CEQA review process. The modified SS-4 area would be constructed utilizing construction crews and equipment that is already present on the project. No new traffic on public roadways would be generated as the site occurs entirely within Simon Preserve. 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 area for SS-4 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 area for SS-4 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 SS-4 area would be sufficiently minor such that any increase in emissions would not result in significant impacts 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 area for SS-4 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 area for SS-4 is not located near noise sensitive areas. The nearest residence is located approximately 900 feet to the northwest of the modified SS-4 area. 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?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace area for SS-4 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 utilization of the proposed modification to SS-4. Temporary impacts would not differ from those analyzed and disclosed within the CEQA review process.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new temporary workspace area for SS-4 would not require agency consultation relating to visual resources.
Vegetation and Wildlife	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>No significant impacts to biological resources are anticipated to occur as a result of the new proposed temporary workspace area for SS-4. The proposed impact area occurs within non-native grassland. Some vegetation trimming/mowing within the footprint of proposed activities will be required, however impacts would be temporary and the existing vegetative cover would not be removed. 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.</p> <p>The new proposed temporary workspace area for SS-4 will be located within approximately 1,800 square feet of non-native grassland habitat dominated by slender wild oats (<i>Avena barbata</i>) and riggut brome (<i>Bromus diandrus</i>). Also present in low densities are native needlegrass (<i>Stipa sp.</i>), splendid mariposa lily (<i>Calochortus splendens</i>), soap plant (<i>Chloragalum sp.</i>), blue dicks (<i>Dichelostemma capitatum</i>), spike moss (<i>Selaginella bigelovii</i>), California-aster (<i>Corethrogyne filaginifolia</i>), and additional native and non-native plants. No sensitive biological resources, including nesting birds, were observed during the recent field visit and re-evaluation. The proposed modified SS-4 will result in a total of 1,800 square feet of temporary impacts to sensitive grassland habitats. These impacts would be temporary and would be similar to those disclosed within the CEQA review process. Following construction, the area will be restored consistent with the <i>SDG&E Subregional NCCP</i> (APM BIO-1). Therefore, no significant impacts (either new or more severe) to biological resources are anticipated.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new proposed temporary workspace area for SS-4 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
				<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
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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