



William Yee
TL6975 Environmental Project Manager
San Diego Gas & Electric Company
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February 16, 2022

Trevor Pratt
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Re: Minor Project Refinement No. 7 for the TL 6975 San Marcos to Escondido Project.

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 7 (MPR-7) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-7 will authorize the use of five temporary work areas to facilitate pier foundation pole installation operations associated with Segment 2 of the Project. The MPR-7 work areas are located entirely within the transmission right-of-way (ROW). The requested additional work areas will total approximately 21,170 square feet, or 0.48 acre. Please refer to **Attachment B, MPR-7 Figure** and **Attachment C, MPR-7 Site Photographs** to view the MPR-7 work areas.

Attachment A: MPR-7 Form

Attachment B: MPR-7 Figure

Attachment C: MPR-7 Site Photographs

Description of MPR-7 Workspace and Activities

As stated above, SDG&E is requesting approval of MPR-7 for five additional temporary work areas (WAs) at Locations 57, 62, 63, 64 and 69 to facilitate the pole installation activities in Segment 2 of the Project. The additional work areas will be used for temporary staging of materials and equipment associated with the pier foundation pole installation activities such as drill support equipment, water trucks for dust control, rebar cages, etc.

There is no vegetation trimming or ground disturbance proposed within the MPR-7 work areas. The MPR-7 work areas are existing pads for non-Project related poles with the exception of WA 57 which is an expansion of the approved work area for Location 57. The existing pads are maintained annually and any vegetation growth within the pads will be cleared during maintenance. The MPR-7 work areas would be accessed from existing access roads. MPR-7 is not

anticipated to result in any impacts to habitat, so there would be no deductions from the Low-Effect Habitat Conservation Plan (LE-HCP) “habitat impact limit” or mitigation drawdown from the available mitigation credits.

Preconstruction Requirements and Permit/Approvals

The activities described herein will not change the conditions set forth in the CPUC’s NTP-1 approval letter dated September 9, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any MMRCPP pre-construction requirements described in NTP-1. No permits are anticipated to be required to perform the proposed MPR-7 activities.

MPR-7 Request for Approval

SDG&E respectfully requests approval of MPR-7 for the approval of the five additional work areas in Segment 2 by February 25, 2022. MPR-7 activities would take place in accordance with conditions outlined in the CPUC’s NTP-1 approval letter, as well as requirements in the IS/MND and MMRCPP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at wye@sdge.com.

Sincerely,



William Yee
TL6975 Environmental Project Manager

cc: Dave Davis, ESA Associates
Melinda Kimble, SDG&E
Josh Taylor, KP Environmental

ATTACHMENT A
MPR-7 Form



TL6975 San Marcos to Escondido 69 kV Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the IS/MND, create a new significant impact, are located within the geographic boundary of the study area of the IS/MND, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: February 16, 2022

Report No.: 7

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 7 (MPR-7) work areas are located entirely within SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-7 work areas are located in the City of San Marcos within the transmission corridor.

Land Use/Vegetative Cover: The land use and land/vegetative cover for the proposed MPR-7 work areas are estimated as follows:

- Location 57 Additional Work Area (WA 57) – 6,650 square feet (0.15 acre) in disturbed and bare ground.
- Location 62 Additional Work Area (WA 62) – 1,890 square feet (0.04 acre) in developed, disturbed and bare ground.
- Location 63 Additional Work Area (WA 63) – 3,540 square feet (0.08 acre) in disturbed and bare ground.
- Location 64 Additional Work Area (WA 64) – 3,825 square feet (0.09 acre) in disturbed and bare ground.
- Location 69 Additional Work Area (WA 69) – 5,265 square feet (0.12 acre) in disturbed and bare ground.

Sensitive Resources: There are no sensitive resources within the MPR-7 work areas.

**Modification
From:**

☐

Permit

☐

Plan/Procedure

☐

Specification

☐

Drawing

☐

Mitigation
Measure

☒

Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-7 for five additional temporary work areas (WA) at Locations 57, 62, 63, 64 and 69 to facilitate pole installation activities in Segment 2 of the TL6975 San Marcos to Escondido Project (Project). The additional work areas will be used for temporary staging of materials and equipment associated with the

pier foundation pole installation activities such as drill support equipment, water trucks for dust control, rebar cages, etc. See **Attachment B, MPR-7 Figure** and **Attachment C, MPR-7 Site Photographs**, for an overview of the proposed MPR-7 work areas.

There is no vegetation trimming or ground disturbance proposed within the MPR-7 work areas. The MPR-7 work areas are existing pads for non-Project related poles with the exception of WA 57 which is an expansion of the approved work area for Location 57. The existing pads are maintained annually and any vegetation growth within the pads will be cleared during maintenance. The MPR-7 work areas would be accessed from existing access roads.

Describe how project refinement deviates from current project. Include photos.

Original Condition: The MPR-7 work areas are located within the geographic study area of the IS/MND and are adjacent to approved work areas, therefore they have been previously analyzed. The conditions of the approved work areas have not changed since the Project was originally designed, however, field constructability review revealed the need for additional space as described below.

Justification for Change:

Following the field constructability review, the construction contractor identified the need to utilize additional space for pier foundation pole installation activities at Locations 57, 62, 63, 64 and 69. In an effort to maximize available space to safely and efficiently perform the pier foundation pole installations while minimizing additional impacts resulting from the Project, MPR-7 is proposing the use of existing maintenance pads and previously disturbed areas to support this work (see **Attachment C, MPR-7 Site Photographs**). The MPR-7 additional work areas would be utilized for temporary staging of materials and equipment such as drill support equipment, water trucks for dust control, rebar cages, etc. In addition, the MPR-7 work areas can be used for safely maneuvering vehicles during pier foundation pole installation activities, such as turn-around areas for cement trucks.

Maps & Figure: Refer to **Attachment B, MPR-7 Figure**, for a map of the proposed MPR-7 work areas. Refer to **Attachment C, MPR-7 Site Photographs**, for pictures of the current conditions of the MPR-7 work areas.

Environmental Impact: Utilization of the MPR-7 work areas would not substantially increase the severity of any impacts disclosed within the IS/MND; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require an additional discretionary approval by the CPUC. There is no vegetation trimming or ground disturbance proposed within the MPR-7 work areas. MPR-7 is not anticipated to result in impacts to habitat; therefore, there would be no deductions from the Low-Effect Habitat Conservation Plan (LE-HCP) "habitat impact limit" or mitigation drawdown from the available mitigation credits. Temporary impacts to type of land cover resulting from MPR-7 are estimated in the table below:

MPR-7 Work Area	Disturbed Habitat	Bare Ground	Developed/ Paved	Total
WA 57	997 sf	5,653 sf	-	6,650 sf (0.15 acre)
WA 62	473 sf	955 sf	462 sf	1,890 sf (0.04 acre)
WA 63	1,062 sf	2,478 sf	-	3,540 sf (0.08 acre)
WA 64	191 sf	3,634 sf	-	3,825 sf (0.09 acre)
WA 69	263 sf	5,002 sf	-	5,265 sf (0.12 acre)
Total:	2,986 sf (0.07 acre)	17,722 sf (0.4 acre)	462 sf (0.01 acre)	21,170 sf (0.48 acre)

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-7 work area is located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	☒	No Resources Present	☐ Resources Present ☐ N/A, Change would not affect resources
Previous Biological Survey Report Reference: Biological resources along the Project alignment were studied, reviewed, and documented as part of the TL6975 Project's Proponent's Environmental Assessment (PEA). Biological Resources were also analyzed within the CPUC-conducted CEQA review process. A pre-construction survey was conducted for the MPR-7 work areas on December 14, 2021. Consistent with Appendix E of the IS/MND, coastal sage scrub (CSS) is present near Locations 57, 62 and 69 and southern maritime chaparral (SMC) is present near Location 64. However, the Project biologist verified that there is no habitat present within the proposed MPR-7 work areas. There were no special-status plant or animal species observed during the pre-construction survey. Biological monitoring is not anticipated to be required within the MPR-7 work areas.			
Cultural	☒	No Resources Present	☐ Resources Present ☐ N/A, Change would not affect resources
Previous Cultural Survey Report Reference: Cultural resources within the Project's study area (including the MPR-7 work areas) were studied, reviewed, and documented as part of the Project's PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's IS/MND, Section 3.5). Pedestrian surveys were completed for the Project's study area in February 2015 for the PEA. There are no known sensitive cultural resources within the MPR-7 work areas, nor are the proposed work areas located in an area with high potential for archaeological deposits. Therefore, cultural and Native American monitoring is not anticipated to be required within the MPR-7 work areas.			
<u>Disturbance Acreage Changes:</u> ☒ Yes ☐ No			
MPR-7 would result in 21,170 square feet (0.48 acre) of additional temporary disturbance to the Project as approved. The temporary impacts proposed in MPR-7 do not overlap with the original impacts for any of the approved work areas.			
Disturbance acreage changes are summarized as follows:			
Location	Temporary Impact	Permanent Impact	Total
Loc 57 (Original)	2,534 sf	28 sf	2,562 sf (0.0 acre)
Loc 62 (Original)	1,434 sf	3,314 sf	4,748 sf (0. acre)
Loc 63 (Original)	2,621 sf	28 sf	2,649 sf (0.06 acre)
Loc 64 (Original)	5,268 sf	4,380 sf	9,648 sf (0.22 acre)
Loc 69 (Original)	5,035 sf	8,070 sf	13,105 sf (0.3 acre)
Total (Original):	16,892 sf (0.39 acre)	15,820 sf (0.36 acre)	32,712 sf (0.75 acre)
WA 57 (New)	6,650 sf (0.15 acre)	-	6,650 sf (0.15 acre)
WA 62 (New)	1,890 sf (0.04 acre)	-	1,890 sf (0.04 acre)
WA 63 (New)	3,540 sf (0.08 acre)	-	3,540 sf (0.08 acre)
WA 64 (New)	3,825 sf (0.09 acre)	-	3,825 sf (0.09 acre)
WA 69 (New)	5,265 sf (0.12 acre)	-	5,265 sf (0.12 acre)
Total (New):	21,170 sf (0.48 acre)	-	21,170 sf (0.48 acre)

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, Seismicity, Paleontological Resources	☐ Y	MPR-7 does not involve the installation of any new facilities or performance of any new construction activities. There is no ground disturbance or vegetation trimming proposed as part of MPR-7 activities. Accordingly, utilization of the MPR-7 temporary work areas would not create any new geological related hazard not previously disclosed in the Project's IS/MND, Section 3.7. In addition, the proposed MPR-7 work areas are not located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP).
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to geology, soils, seismicity, or paleontological resources.
	☒ N	
Hazardous Materials and Waste	☐ Y	There are no new facilities or performance of any new construction activities being proposed in MPR-7 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-7 work areas would not require any new potentially hazardous materials to be used and would not create any new hazardous waste that could expose the public to hazards not previously disclosed in the Project's IS/MND. All activities will be performed in accordance with the Project's Health and Safety Plan (APM HAZ-1) as well as the Soil and Dewatering Management Plan (MM HAZ-1).
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to hazards or hazardous materials.
	☒ N	
Hydrology / Water Quality	☒ Y	The following MPR-7 work areas are near non-jurisdictional drainage features: • WA 57: There is a concrete drainage feature approximately 40 feet southwest of the location of the new pole (Location 57), on the opposite side of the access road. This drainage feature will be avoided by construction at this location and would not be affected by the proposed use of WA 57. • WA 62: There is a small rock swale approximately 8 feet northwest of WA 62. This rock swale is outside of the proposed work area and will be avoided by construction. • WA 63: There is an existing rock swale that borders the access road at this location. There will be no equipment idling or staging of materials within the rock swale during MPR-7 activities. • WA 69: There is an existing concrete drainage feature approximately 10 feet east of WA 69, upslope from the proposed work area. This drainage will be avoided and will not be affected by the proposed use of WA 69. No jurisdictional (or non-jurisdictional) aquatic resources would be impacted by MPR-7 activities.
	☐ N	

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.
		MPR-7 would not impede or redirect flood flow, conflict with any local water quality control plans or otherwise result in impacts to hydrology and water quality that would be different from the impacts assessed in the Project's IS/MND, Section 3.10.
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to hydrology or water quality.
	☒ N	
Cultural Resources	☐ Y	Review of the Project's previous cultural resources survey reports prepared for the PEA determined there are no known sensitive cultural resources within the MPR-7 work areas, nor are they located in an area with high potential for archaeological deposits. There is no vegetation trimming or ground disturbance proposed within the MPR-7 work areas. Therefore, cultural monitoring is not anticipated to be required within the MPR-7 work areas and impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5.
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency or tribal consultation in relation to cultural resources.
	☒ N	
Tribal Cultural Resources	☐ Y	As stated in the previous section, there are no known sensitive cultural resources (including tribal cultural resources) within the MPR-7 work areas, nor are they located in an area with high potential for archaeological deposits. Therefore, Native American monitoring is not anticipated to be required within the MPR-7 work areas and impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.18.
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency or tribal consultation in relation to tribal cultural resources.
	☒ N	
Traffic and Circulation	☐ Y	MPR-7 would not require traffic control and would not affect traffic control on public roads. MPR-7 activities would not involve a schedule extension or different construction activities or equipment that would create a change to the number of construction-related trips on local roadways that would not be accounted for in the IS/MND, Section 3.17 and NTP-1. In addition, MPR-7 work areas would be accessed using existing access roads.
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to traffic and circulation.
	☒ N	
Air Quality	☐ Y	MPR-7 would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's IS/MND, Section 3.3, as there is no new construction equipment or new activities proposed as part of this MPR-7 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-7 work areas. These requirements include but are not limited to limiting vehicle speed to 15 miles per hour on work sites, regular watering of work sites to mitigate fugitive dust (NCCP Section 7.1 Operational Protocol No. 39) and restrictions on fugitive dust and air
	☒ N	

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.
		quality found in the San Diego Air Pollution Control District (SDAPCD) Regulation IV. Therefore, MPR-7 would not affect air quality or emissions in a manner substantially different from the impacts assessed as part of the Project's IS/MND.
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to air quality.
	☒ N	
Noise and Vibration	☐ Y	MPR-7 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were already analyzed in the Project's IS/MND, Section 3.13. There are no new activities proposed as part of this MPR-7 request, and the proposed MPR-7 work areas are not within 100 feet of a sensitive receptor. The approved work area at Location 57 is approximately 150 feet east of the nearest sensitive receptor. The addition of WA 57 as part of this MPR-7 request would expand the existing work area east in the opposite direction of the nearest sensitive receptor. This would allow any noise-generating equipment to be staged as far away from the nearby homes as possible. All activities performed within the proposed MPR-7 work areas would take place in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP).
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to noise and vibration.
	☒ N	
Aesthetics/ Visual Resources	☐ Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-7 work areas, and there is no vegetation trimming or ground disturbance proposed. In addition, the MPR-7 work areas are not located within a Key Observation Point (KOP), scenic vista, or other scenic resource identified in the IS/MND. Therefore, MPR-7 would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's IS/MND.
	☒ N	
Agency Consultation?	☐ Y	MPR-7 would not require agency consultation relating to visual resources.
	☒ N	
Vegetation and Wildlife	☐ Y	There is no vegetation trimming or ground disturbance proposed as part of MPR-7 activities and there are no impacts to habitat anticipated within the MPR-7 work areas. Therefore, there would be no deductions from the LE-HCP "habitat impact limit" or mitigation drawdown from the available mitigation credits. Biological monitoring is not anticipated to be required within the MPR-7 work areas, and impacts would remain similar to those analyzed and disclosed in the IS/MND, Section 3.4. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-7 activities, as well as the requirements in the NCCP: • APM BIO-1
	☒ N	

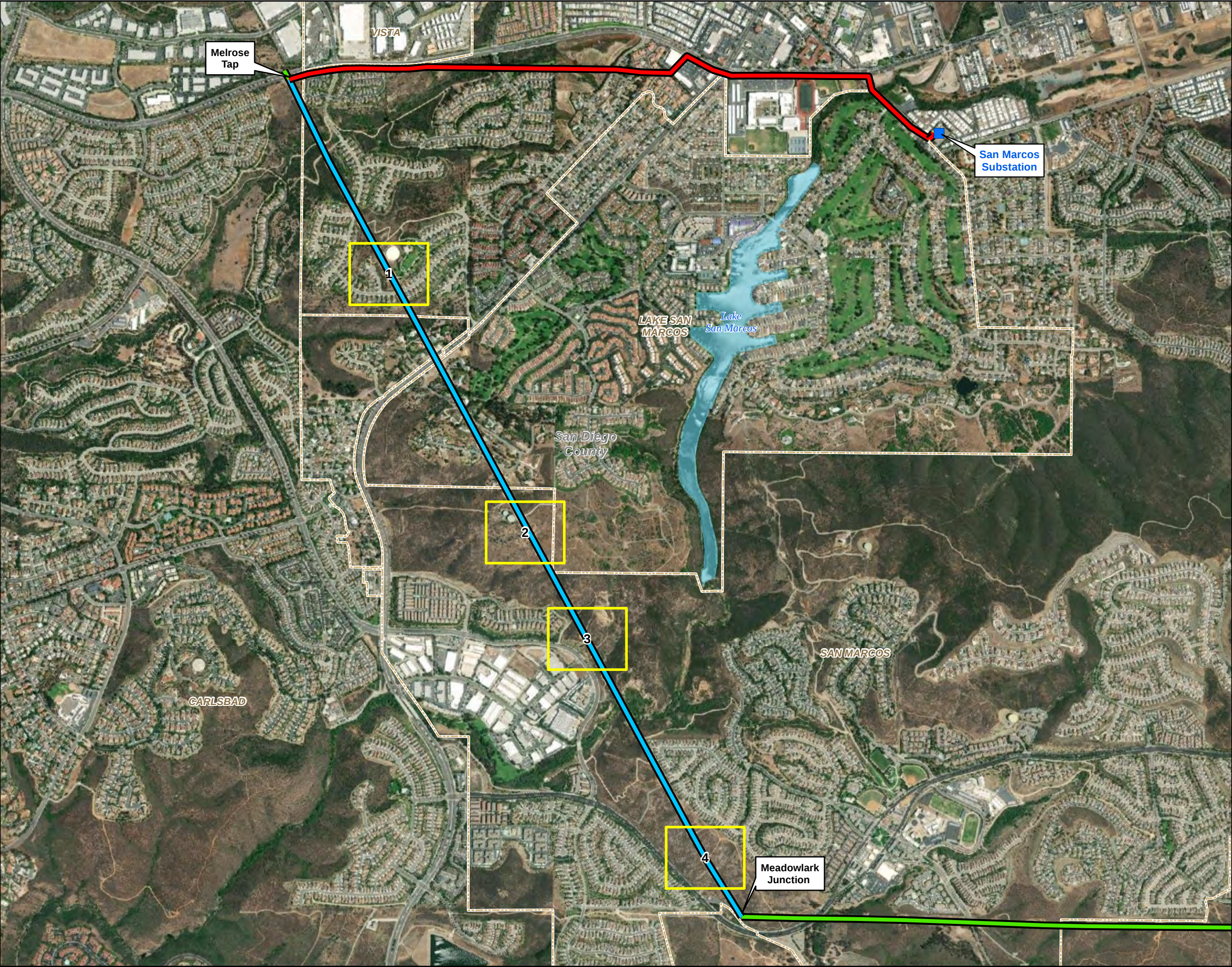
ATTACHMENT B
MPR-7 Figure

TL6975 SAN MARCOS
to ESCONDIDO PROJECT

MPR-7 Figure 1
Mapbook
San Diego County, CA

LEGEND

- Mapbook Page
- Municipal Boundary
- Waterbody
- Proposed Project**
 - Existing Substation
 - Proposed Deepwell Locations
 - Proposed Coupon Test Stations
 - Segment 1 - Rebuild
 - Segment 2 - New Build
 - Segment 3 - Re-conductor / Re-energize



0 500 1,000 1,500 2,000
Feet



Data Sources: CalTrans, CPUC, ESRI, SANDAG, SanGIS, SDG&E, USDA.
F:\Projects\SDG&E MPR-7 Mapbook Key 021622.mxd
02/16/2022 RNC

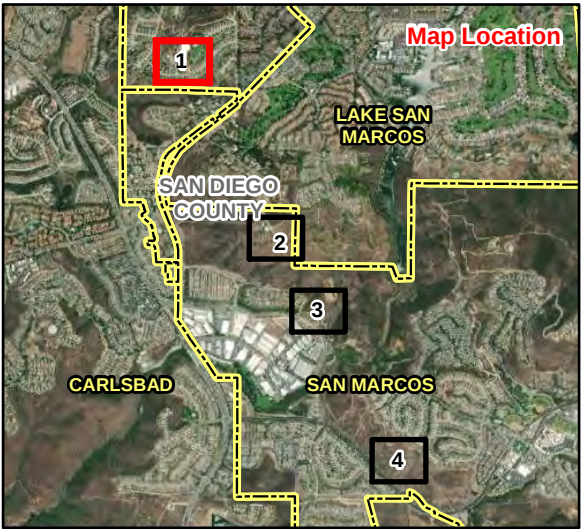
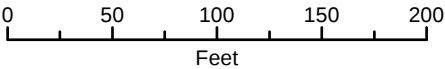


TL6975 SAN MARCOS
to ESCONDIDO PROJECT

MPR-7 Figure 1
Mapbook

LEGEND

- Existing Structure
- Existing 138kV Transmission Line
- State Highway
- Municipal Boundary
- Proposed Project**
 - New Pier Foundation
 - New Direct Bury
 - Overhead Work
 - No Work / Information Only
 - Rack
 - Segment 2 - New Build
 - Segment 3 - Reconductor / Re-energize
- Existing Access Road
- Permanent Work Area or Grading Impacts
- Temporary Work Area or Grading Impacts
- Existing ROW
- Stringing Site
- MPR-7 Component**
 - MPR-7 Temporary Work Areas

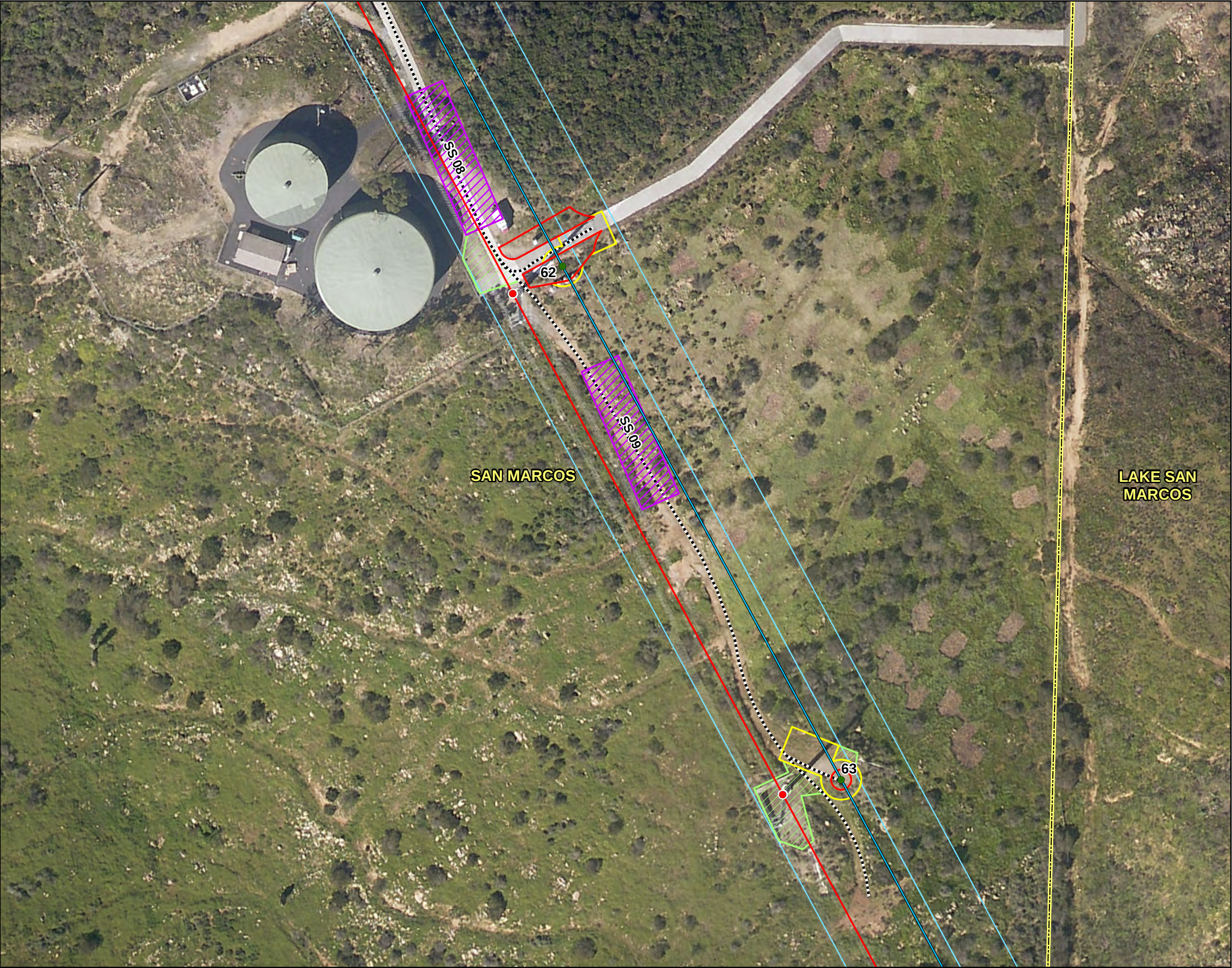
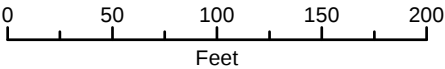


TL6975 SAN MARCOS
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MPR-7 Figure 1
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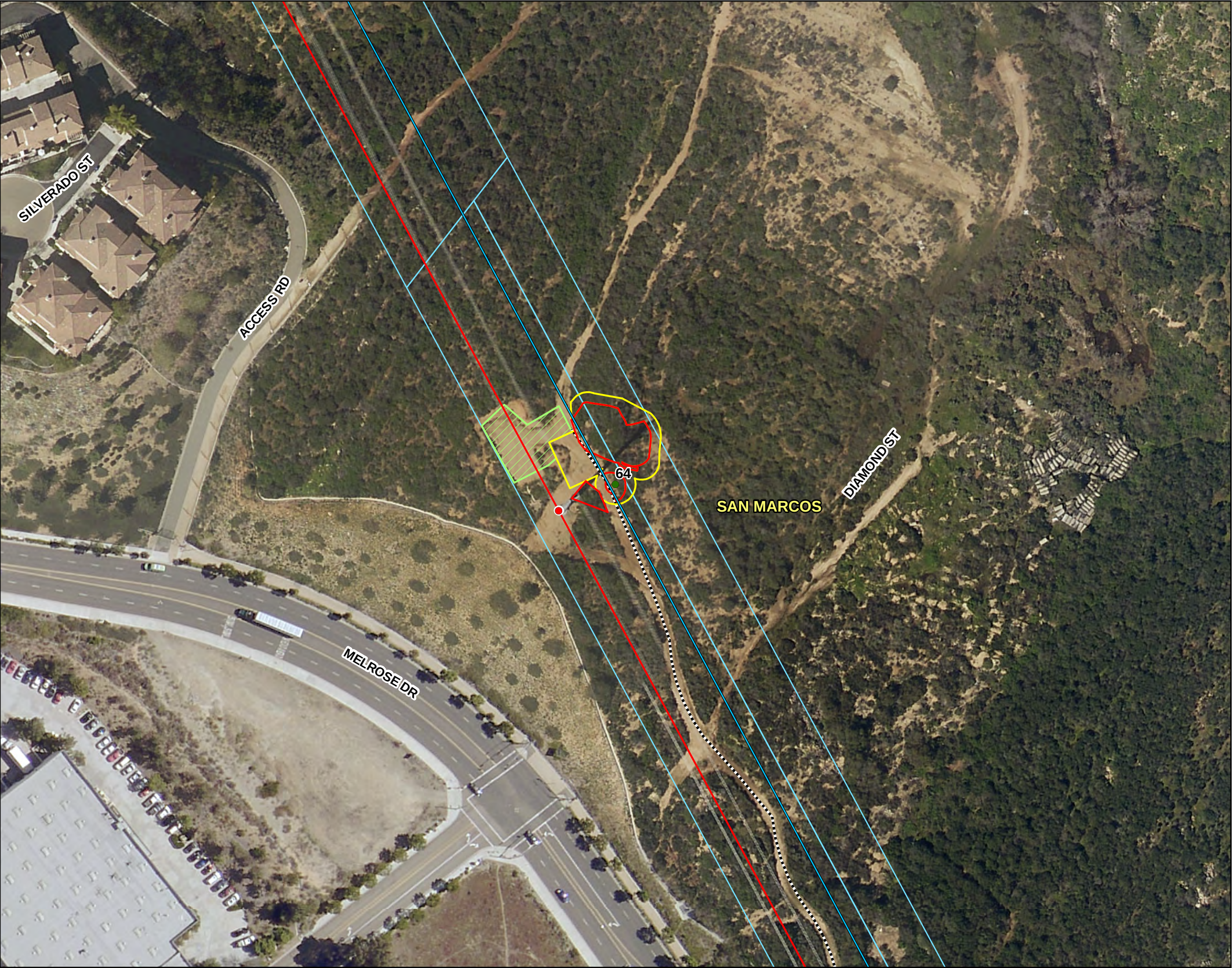
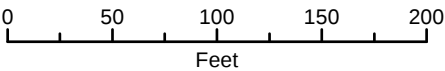


TL6975 SAN MARCOS
to ESCONDIDO PROJECT

MPR-7 Figure 1
Mapbook

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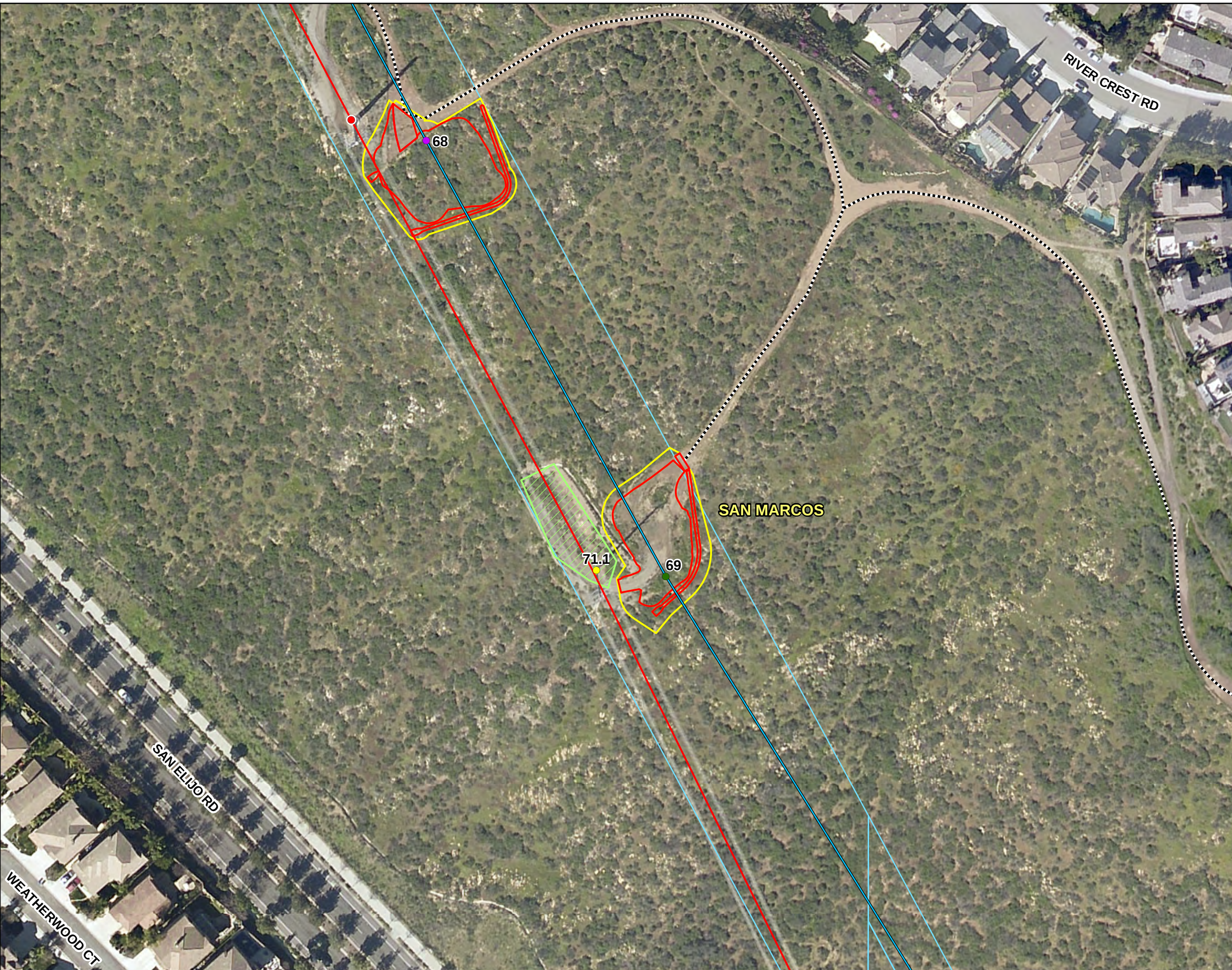
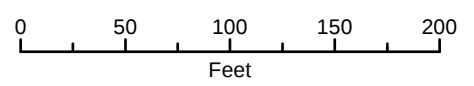


TL6975 SAN MARCOS
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MPR-7 Figure 1
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- Stringing Site
- MPR-7 Component**
 - MPR-7 Temporary Work Areas



ATTACHMENT C
MPR-7 Site Photographs

MPR-7 PHOTO LOG



Photograph 1:

View of the requested expansion of WA 57 in green, and the approved work area for Location 57 in yellow. The access road is shown with arrows. Facing: E



Photograph 2:

View of the requested expansion of WA 57 in green, and the approved work area for Location 57 in yellow. The access road is shown with arrows. Facing: N

MPR-7 PHOTO LOG



Photograph 3:

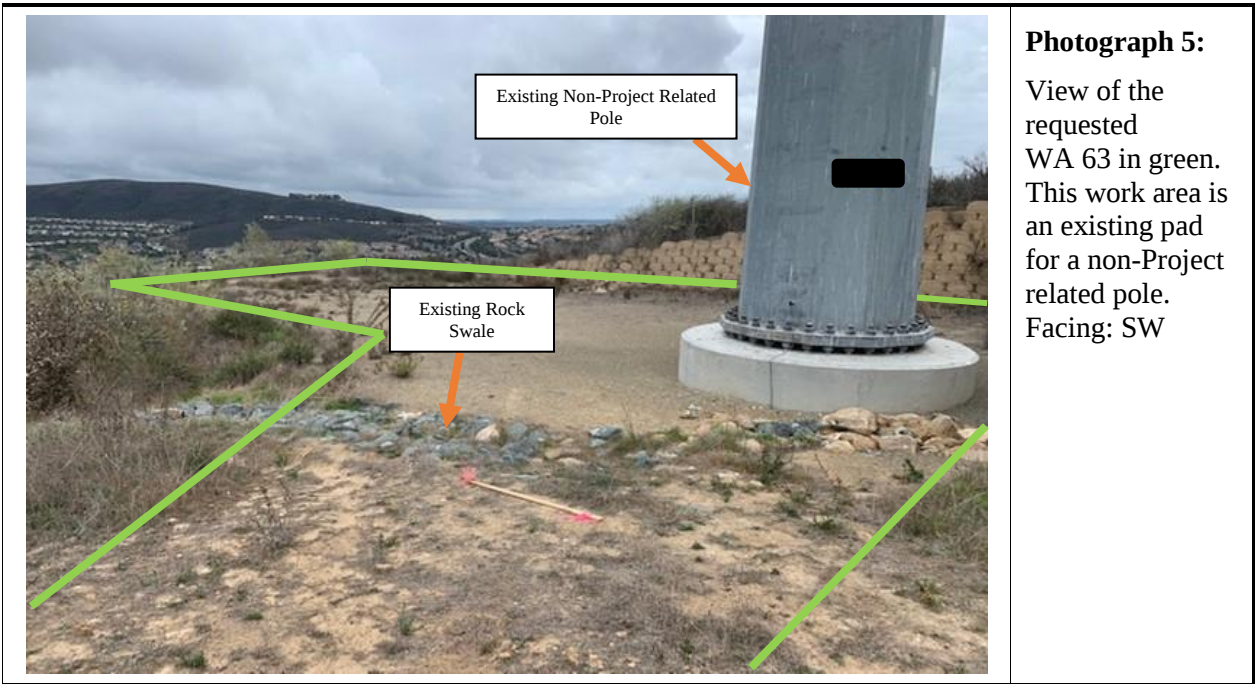
View of the requested WA 62 in green adjacent to Stringing Site 8 shown in purple. Part of this work area is within an existing pad for a non-Project related pole. The access road is shown with arrows. Facing: N



Photograph 4:

View of the requested WA 62 in green. Part of this work area is within an existing pad for a non-Project related pole. The access road is shown with arrows. Facing: S

MPR-7 PHOTO LOG



MPR-7 PHOTO LOG



MPR-7 PHOTO LOG

