



William Yee
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March 17, 2022

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

Re: Minor Project Refinement No. 9 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. 9 (MPR-9) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-9 will authorize the use of an additional temporary work area at Location 59 to facilitate grading, pier foundation and pole installation activities. The MPR-9 work area is located entirely within the existing SDG&E transmission right-of-way (ROW). The requested additional work area is approximately 2,000 square feet, or 0.05 acre. Please refer to **Attachment B, MPR-9 Figure** and **Attachment C, MPR-9 Site Photographs** to view the MPR-9 work area.

- Attachment A: MPR-9 Form
- Attachment B: MPR-9 Figure
- Attachment C: MPR-9 Site Photographs

Description of MPR-9 Workspace and Activities

As stated above, SDG&E is requesting approval of MPR-9 for an additional temporary work area to facilitate construction activities at Location 59 for the TL6975 San Marcos to Escondido Project (Project). The additional work area will be used primarily for access and temporary staging of materials and equipment associated with grading, pier foundation and pole installation activities.

Minor ground disturbance will be required within a 5-foot by 30-foot (150-square foot) portion of the temporary work area in order to construct the toe of a new fill slope to meet compaction requirements and specifications in the Grading Permit issued by the City of San Marcos. This area will not be part of the permanent pad and therefore will not be maintained in perpetuity. The additional work area will be accessed using the existing utility access road entrance off of Coast Avenue. Please note, **Attachment B, MPR-9 Figure** includes the existing access road portion that travels west from the entrance to the existing non-Project related pole. This access road portion is

also being proposed for use during construction activities at Location 59. MPR-9 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-9 activities.

MPR-9 Request for Approval

SDG&E respectfully requests approval of MPR-9 for the approval of an additional work area at Location 59 in Segment 2 by March 24, 2022. MPR-9 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-9 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: March 17, 2022

Report No.: 9

Date Approved: March 24, 2022

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 9 (MPR-9) work area is located entirely within SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-9 work area is 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-9 work area is 2,000 square feet (0.05 acre) of disturbed habitat.

Sensitive Resources: There are no sensitive resources within the MPR-9 work area.

Modification From:

<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other:		

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-9 for an additional temporary work area to facilitate construction activities at Location 59 for the TL6975 San Marcos to Escondido Project (Project). The additional work area will be used primarily for access and temporary staging of materials and equipment associated with grading, pier foundation and pole installation activities. Minor ground disturbance will be required within a 5-foot by 30-foot (150-square foot) portion of the temporary work area in order to construct the toe of a new fill slope to meet compaction requirements and specifications in the Grading Permit issued by the City of San Marcos. This area will not be part of the permanent pad and therefore will not be maintained in perpetuity. See **Attachment B, MPR-9 Figure** and **Attachment C, MPR-9 Site**

Photographs, for an overview of the proposed MPR-9 work area. The MPR-9 work area will be accessed using the existing utility access road entrance off of Coast Avenue.

Please note, **Attachment B, MPR-9 Figure** includes the existing access road portion that travels west from the entrance to the existing non-Project related pole. This access road portion is also being proposed for use during construction activities at Location 59.

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

Original Condition: The MPR-9 work area is located within the geographic study area of the IS/MND and is connected to the approved work area for Location 59; therefore, it has been previously analyzed. The conditions of the approved work area 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 in order to construct the new fill slope at this location and meet specifications in the Grading Permit issued by the City of San Marcos. The proposed MPR-9 work area will be situated at the toe of a new fill slope once the graded pad is installed (permanent work area). In addition, the temporary work area will allow construction crews to maximize available space, and safely and efficiently perform the pier foundation and pole installation activities at this location.

Maps & Figure: Refer to **Attachment B, MPR-9 Figure**, for a map of the proposed MPR-9 work area. Refer to **Attachment C, MPR-9 Site Photographs**, for pictures of the current conditions of the MPR-9 work area.

Environmental Impact: Utilization of the MPR-9 work area 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 or other agencies. As stated above, there is no vegetation trimming or ground disturbance proposed beyond the approximately 5-foot by 30-foot (150-square foot) area where ground disturbance will be required to construct the toe of the new fill slope. This would not be considered a new permanent impact as the area will not be part of the permanent pad, and therefore would not be maintained in perpetuity. MPR-9 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. MPR-9 would result in 2,000 square feet (0.05 acre) of temporary impacts to disturbed habitat.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-9 work area is located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:

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-9 work area on March 09, 2022. Consistent with Appendix E of the IS/MND, the Project biologist verified that the MPR-9 work area is located within disturbed habitat. 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-9 work area or at Location 59.

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-9 work area) 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-9 work area, nor is the proposed work area 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-9 work area or at Location 59.

Disturbance Acreage Changes: Yes No

MPR-9 would result in additional temporary disturbance to the Project as approved. The temporary impacts proposed in MPR-9 do not overlap with the original impacts for the approved work area at Location 59 (see table below).

Location	Temporary Impact	Permanent Impact	Total
Loc 59 (Original)	2,360 sf (0.05 acre)	6,338 sf (0.15 acre)	8,698 sf (0.20 acre)
MPR-9 Work Area (New)	2,000 sf (0.05 acre)	-	2,000 sf (0.05 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	<input type="checkbox"/> Y	MPR-9 does not involve the installation of any new facilities or performance of any new construction activities. There is no significant ground disturbance and no vegetation trimming proposed as part of MPR-9 activities. Accordingly, utilization of the
	<input checked="" type="checkbox"/> 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-9 temporary work area would not create any new geologically-related hazard beyond what was previously disclosed in the Project's IS/MND, Section 3.7. In addition, the proposed MPR-9 work area is not located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP).
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-9 would not require agency consultation relating to geology, soils, seismicity, or paleontological resources.
Hazardous Materials and Waste	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	There are no new facilities or performance of any new construction activities being proposed in MPR-9 beyond what was previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-9 work area 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. 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).
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-9 would not require agency consultation relating to hazards or hazardous materials.
Hydrology / Water Quality	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	There are no jurisdictional or non-jurisdictional drainages that would be affected by the proposed MPR-9 work area. MPR-9 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?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-9 would not require agency consultation relating to hydrology or water quality.
Cultural Resources	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	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-9 work area, nor is the MPR-9 work area located in an area with high potential for archaeological deposits. Therefore, cultural monitoring is not anticipated to be required within the MPR-9 work area or at Location 59 and impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-9 would not require agency or tribal consultation in relation to cultural resources.

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.
Tribal Cultural Resources	<input type="checkbox"/> Y	As stated in the previous section, there are no known sensitive cultural resources (including tribal cultural resources) within the MPR-9 work area, nor is it located in an area with high potential for archaeological deposits. Therefore, Native American monitoring is not anticipated to be required within the MPR-9 work area and impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.18.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-9 would not require agency or tribal consultation in relation to tribal cultural resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	MPR-9 would not require traffic control and would not affect traffic control on public roads. An existing access road portion that leads to the non-Project related existing pole at the Location 59 work area is being proposed for use in MPR-9. The use of this access road portion or the MPR-9 work area 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 beyond what was accounted for in the IS/MND, Section 3.17 and NTP-1.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-9 would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	MPR-9 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-9 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-9 work area. 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 quality found in the San Diego Air Pollution Control District (SDAPCD) Regulation IV. Therefore, MPR-9 would not affect air quality or emissions in a manner substantially different from the impacts assessed as part of the Project's IS/MND.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-9 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> 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.
Noise and Vibration	<input checked="" type="checkbox"/> Y	<p>The Location 59 work area (including the MPR-9 work area) is within 100 feet of the sensitive receptors on its east and west sides. In compliance with the Construction Noise Reduction and Mitigation Plan (CNRMP, MM NOI-1), noise monitoring will take place at the nearest sensitive receptor for each new construction activity (vegetation trimming, grading, drilling, etc.), until noise levels are shown to consistently comply with applicable noise requirements. As the closest sensitive receptor is on the east side of the work area (approx. 30 feet), it can be assumed that if noise levels remain in compliance during monitoring at 30 feet, they will also be in compliance at 73 feet, the distance between the sensitive receptor on the west side of Location 59 and the MPR-9 work area boundary.</p> <p>Consistent with the CNRMP, noise reduction measures will be implemented for the duration of construction and staged equipment will be located as far away from the sensitive receptors as possible. If monitoring detects that noise levels have exceeded the applicable standards, corrective actions will be implemented to the extent feasible per Section 4.1.2 of the CNRMP. The addition of the MPR-9 work area would not result in new construction equipment or activities in this location. Therefore, MPR-9 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration already analyzed in the Project's IS/MND, Section 3.13. All activities performed within the proposed MPR-9 work area would take place in accordance with the CNRMP.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-9 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-9 work area, and there is no vegetation trimming or ground disturbance proposed. In addition, the MPR-9 work area is not located within a Key Observation Point (KOP), scenic vista, or other scenic resource identified in the IS/MND. Therefore, MPR-9 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.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-9 would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input type="checkbox"/> Y	There are no impacts to habitat proposed within the MPR-9 work area. Therefore, deductions from the LE-HCP "habitat impact limit"

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.
	<input checked="" type="checkbox"/> N	<p>or mitigation drawdown are not required from the available mitigation credits.</p> <p>Biological monitoring is not anticipated to be required within the MPR-9 work area, 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-9 activities, as well as the requirements in the NCCP:</p> <ul style="list-style-type: none"> • APM BIO-1 • APM BIO-2 • APM BIO-3 • APM BIO-4 • APM BIO-6 • APM BIO-7 • APM BIO-9 • MM BIO-1: Project Compliance with the Federal and California Endangered Species Acts. • MM BIO-2: Establishment of Cylindrical Construction Buffers
Agency Consultation?	<input type="checkbox"/> Y	MPR-9 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	The MPR-9 work area is not within a CPUC High Fire Threat District (HFTD). However, SDG&E and its contractors will still conduct all activities in accordance with the Project's Construction Fire Prevention Plan and MM WIL-1. In addition, there are no new activities proposed, no extension in work schedule, or an increase in equipment or personnel required as a result of MPR-9. Therefore, MPR-9 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to wildfire beyond what was already analyzed in the Project's IS/MND, Section 3.20.
	<input checked="" type="checkbox"/> N	
Agency Consultation	<input type="checkbox"/> Y	MPR-9 would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	3/25/2022	Melinda Kimble		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	3/25/2022	William Yee		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	3/24/2022	Trevor Pratt		<input checked="" 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
<u>Conditions of Approval or Reason for Denial:</u>				
Prepared by:			Date:	

ATTACHMENT B
MPR-9 Figure

**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**

**MPR-9 Figure 1
Structure Location 59
San Diego County, CA**

LEGEND

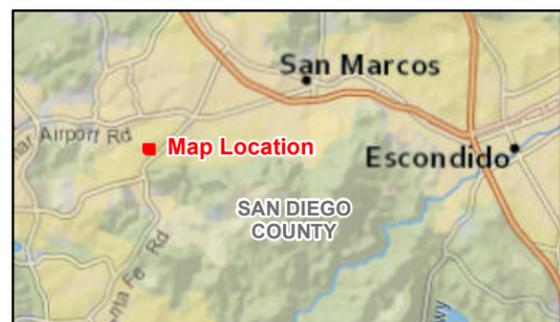
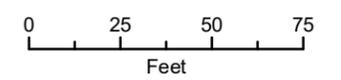
- Existing Structure
- Existing 138kV Transmission Line
- State Highway
- Proposed Project**
- New Pier Foundation
- Guard Structures
- Segment 2 - New Build
- - - - - Existing Access Road
- Existing ROW
- Stringing Site
- Permanent Work Area or Grading Impacts
- Temporary Work Area
- MPR-9 Components**
- Existing Access Road Map Correction
- Additional Temporary Work Area



SUMMIT PT WY

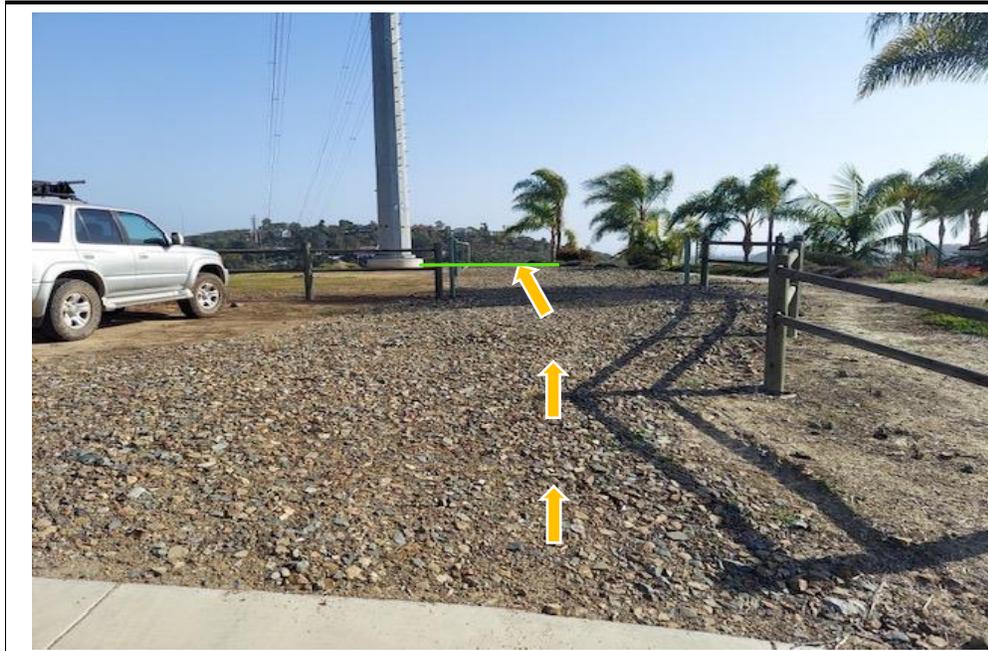
COAST AV

Loc #59

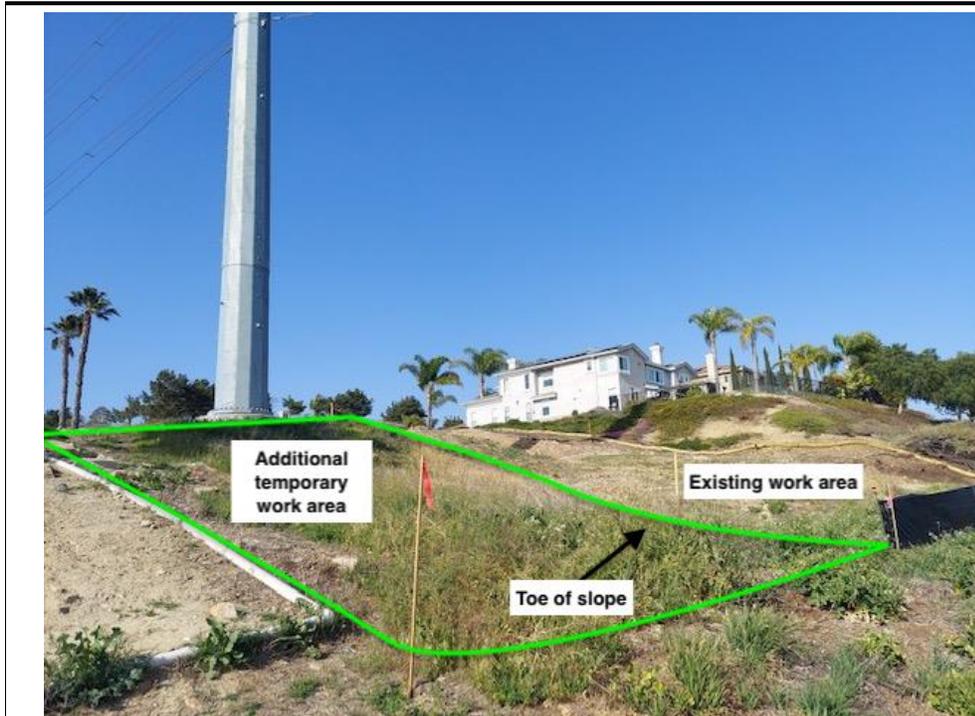


ATTACHMENT C
MPR-9 Site Photographs

MPR-9 PHOTO LOG



Photograph 1:
View of existing access road to Location 59 and additional MPR-9 temporary work area. Facing: South



Photograph 2:
View of the MPR-9 additional temporary work area abutting the existing Location 59 work area. Facing: NE