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April 13, 2022

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

Re: Minor Project Refinement No. 10 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. 10 (MPR-10) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-10 will authorize the use of additional work areas at Locations 51-54 as well as the use of an existing access road to Location 54 to facilitate pole and overhead wire installation activities. The MPR-10 work areas are located within the existing SDG&E transmission right-of-way (ROW), or immediately adjacent to the ROW in the City of Carlsbad. The requested additional work areas total 9,570 square feet, or 0.22 acre. Please refer to **Attachment B, MPR-10 Figure** and **Attachment C, MPR-10 Site Photographs** to view the MPR-10 work areas.

- Attachment A: MPR-10 Form
- Attachment B: MPR-10 Figure
- Attachment C: MPR-10 Site Photographs
- Attachment D: MPR-10 Habitat Impact Limit and Mitigation Accounting

Description of MPR-10 Workspace and Activities

As stated above, SDG&E is requesting approval of MPR-10 for additional work areas to facilitate pole and overhead wire installation activities at Locations 51-54 on the TL6975 San Marcos to Escondido Project (Project).

- **Location 51 Additional Work Area (WA 51):** WA 51 is located east of Location 51. WA 51 will be utilized for staging of materials and equipment during the installation of dead-ends on the pole at Location 51 and will allow for adequate space to set up a guard structure for wire installation over Palomar Airport Road. One Peruvian pepper tree is proposed for removal within WA 51. Tree removal will take place using a chainsaw and skid steer.

- **Location 52 Additional Work Area (WA 52):** There are three areas labeled WA 52 shown on **Attachment B, MPR-10 Figure** to facilitate the installation of the new pole and stringing of conductor at Location 51. One area is the slope between the two access road segments northwest of Location 52, which will allow for adequate space for one side of the 24-foot wide outriggers of the crane. The crane and the other side of the outriggers will be situated within the existing work area for Location 53 and stringing site 05. This area of WA 52 would also be utilized for temporary staging of materials during construction activities at Locations 51-53.

Another area of WA 52 is located south of the existing road west of Location 52. This area will allow construction equipment to access the existing work area labeled, “Permanent Work Area” from the existing access road during construction activities. The third area of WA 52 is located on the east side of the existing work area labeled, “Permanent Work Area.” This area would be used to position stringing equipment in line with Location 51 during the wire pull from Locations 51-58. Vegetation trimming will be required within WA 52 and the area labeled, “Permanent Work Area.”

- **Location 53 Additional Work Area (WA 53):** WA 53 is located west of Location 53 and stringing site 05. The additional work area will be utilized as an extension of stringing site 05 to accommodate the wire pulling equipment for the wire installation activities for Locations 25-51. Three ornamental Peruvian pepper trees are proposed for removal within WA 53, and one Peruvian pepper tree would be trimmed in order to make room for the wire pulling equipment and access to the site by the large equipment used to install the pole at Location 51.
- **Location 54 Additional Work Area (WA 54):** WA 54 is located north of Location 54. The additional work area will be used for staging of equipment during foundation and pole installation activities, as well as the installation of conductor. The existing access road to WA 54 was not included in the Initial Study/Mitigated Negative Declaration (IS/MND) or NTP-1 Mapbooks and is therefore proposed for use herein as shown in **Attachment B, MPR-10 Figure**. A wood ramp will be positioned over the curb at the access road entrance in the business park to facilitate access for equipment and vehicles.

The existing pad and access road for the non-Project related existing pole west of Location 54 will be used for additional Project vehicle parking and temporary staging during construction activities at Location 54. Vegetation trimming will be required within WA 54. In addition, Location 54.1 has been changed from No Work/Information Only (as shown in the NTP-1 Mapbook) to Pole Top Work Only in **Attachment B**, as overhead work will be required at that location during wire installation activities. The overhead work required at 54.1 can be performed from the existing access road using a bucket truck, therefore an additional work area at this location is not being proposed. No work is proposed at Location 54.2.

Grading will not occur within the MPR-10 work areas. Any vegetation trimming would be completed with both hand tools and a skid steer with a mower deck and would be no less than 4

inches above the ground to maintain the root structure and seed bank per the SDG&E Natural Communities Conservation Plan (NCCP) Operational Protocol No. 36 (Section 7.1). It should also be noted, grading will no longer be required within the existing work area south of Location 52 labeled “Permanent Work Area”, nor will a permanent pad or permanent swale be installed as part of the Project.

Locations 51-53 would be accessed via the existing access road entrance off Palomar Airport Road (within stringing site 05). Construction vehicles that cannot access WA 51 or WA 53 via the access road entrance due to the angle of entry (concrete trucks, wire pulling equipment, etc.) will access directly from the road using traffic control. Traffic control activities to access WA 51 and WA 53 have been approved by the City of Carlsbad in ROW Permit and Traffic Control Plan No. ROW2021-0869 submitted to the CPUC on January 19, 2022. Any damage to public roadways, including any curb damage, resulting from MPR-10 activities will be immediately repaired following completion of MPR-10 construction activities in accordance with APM PS-4. In accordance with the Stormwater Pollution Prevention Plan (SWPPP), the temporary disturbance associated with the MPR-10 work areas will be stabilized with a native seed mix.

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 MMRCP pre-construction requirements described in NTP-1. Traffic control activities to access WA 51 and WA 53 have been approved by the City of Carlsbad in ROW Permit and Traffic Control Plan No. ROW2021-0869 submitted to the CPUC on January 19, 2022. SDG&E will receive concurrence from the property owner (Rancho Carillo Masters Association) prior to the removal of the Peruvian pepper trees discussed above. Post-construction restoration of the trees and ornamental vegetation impacted by MPR-10 activities would be performed in coordination with the property owner.

MPR-10 Request for Approval

SDG&E respectfully requests approval of MPR-10 for the approval of additional work areas at Locations 51-54 and the use of the existing access road at Location 54 by April 22, 2022. MPR-10 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 MMRCP. 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-10 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: April 13, 2022

Report No.: 10

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 10 (MPR-10) work areas are located within SDG&E's transmission line right-of-way (ROW), or immediately adjacent to the ROW, in the City of Carlsbad.

Location/Milepost: The MPR-10 work areas are located in the City of Carlsbad adjacent to Palomar Airport Road.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-10 work areas are estimated as follows:

Sensitive Resources: There is CSS present within WA 54. See resource discussions below.

- Location 51 Additional Work Area (WA 51) –1,190 square feet (0.03 acre) in paved ground, ornamental vegetation, and disturbed.
- Location 52 Additional Work Area (WA 52) –5,080 square feet (0.11 acre) in disturbed.
- Location 53 Additional Work Area (WA 53) –2,915 square feet (0.07 acre) in paved ground, ornamental vegetation, and bare ground.
- Location 54 Additional Work Area (WA 54) – 385 square feet (0.01 acre) in coastal sage scrub (CSS).

Modification From: Permit Plan/Procedure Specification Drawing
 Mitigation Measure Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-10 for additional work areas to facilitate pole and conductor installation activities at Locations 51-54, as well as the use of an existing access road to Location 54, on the TL6975 San Marcos to Escondido Project (Project). See

Attachment B, MPR-10 Figure and **Attachment C, MPR-10 Site Photographs**, for an overview of the proposed MPR-10 work areas.

- **Location 51 Additional Work Area (WA 51):** WA 51 is located east of Location 51. WA 51 will be utilized for staging of materials and equipment during the installation of dead-ends on the pole at Location 51 and will allow for adequate space to set up a guard structure for wire installation over Palomar Airport Road. One Peruvian pepper tree is proposed for removal within WA 51 (See **Attachment C, MPR-10 Site Photographs**). Tree removal will take place using a chainsaw and skid steer.
- **Location 52 Additional Work Area (WA 52):** There are three areas labeled WA 52 shown on **Attachment B, MPR-10 Figure** to facilitate the installation of the new pole and stringing of conductor at Location 51. One area is the slope between the two access road segments northwest of Location 52, which will allow for adequate space for one side of the 24-foot wide outriggers of the crane. The crane and the other side of the outriggers will be situated within the existing work area for Location 53 and stringing site 05. This area of WA 52 would also be utilized for temporary staging of materials during construction activities at Locations 51-53.

Another area of WA 52 is located south of the existing road west of Location 52. This area will allow construction equipment to access the existing work area labeled, "Permanent Work Area" from the existing access road during construction activities. The third area of WA 52 is located on the east side of the existing work area labeled, "Permanent Work Area." This area would be used to position stringing equipment in line with Location 51 during the wire pull from Locations 51-58. Vegetation trimming will be required within WA 52 and the area labeled, "Permanent Work Area."

- **Location 53 Additional Work Area (WA 53):** WA 53 is located west of Location 53 and stringing site 05. The additional work area will be utilized as an extension of stringing site 05 to accommodate the wire pulling equipment for the wire installation activities for Locations 25-51. Three ornamental Peruvian pepper trees are proposed for removal within WA 53, and one Peruvian pepper tree would be trimmed in order to make room for the wire pulling equipment and access to the site by the large equipment used to install the pole at Location 51.
- **Location 54 Additional Work Area (WA 54):** WA 54 is located north of Location 54. The additional work area will be used for staging of equipment during foundation and pole installation activities, as well as the installation of conductor. The existing access road to WA 54 was not included in the Initial Study/Mitigated Negative Declaration (IS/MND) or NTP-1 Mapbooks and is therefore proposed for use herein as shown in **Attachment B, MPR-10 Figure**. A wood ramp will be positioned over the curb at the access road entrance in the business park to facilitate access for equipment and vehicles.

The existing pad and access road for the non-Project related existing pole west of Location 54 will be used for additional Project vehicle parking and temporary staging during construction activities at Location 54. Vegetation trimming will be required within WA 54. In addition, Location 54.1 has been changed from No Work/Information Only (as shown in the NTP-1 Mapbook) to Pole Top Work Only in **Attachment B**, as overhead work will be required at that location during wire installation activities. The overhead work required at 54.1 can be performed from the existing access road using a bucket truck, therefore an additional work area at this location is not being proposed. No work is proposed at Location 54.2.

Grading will not occur within the MPR-10 work areas. Any vegetation trimming would be completed with both hand tools and a skid steer with a mower deck and would be no less than 4 inches above the ground to maintain the root structure and seed bank per the SDG&E Natural Communities Conservation Plan (NCCP) Operational Protocol No. 36 (Section 7.1). It should also be noted, grading will no longer be required within the existing work area south of Location 52 labeled "Permanent Work Area", nor will a permanent pad or permanent swale be installed as part of the Project.

Locations 51-53 would be accessed via the existing access road entrance off Palomar Airport Road (within stringing site 05). Construction vehicles that cannot access WA 51 or WA 53 via the access road entrance due to the angle of entry (concrete trucks, wire pulling equipment, etc.) will access directly from the road using traffic control. Traffic control activities to access WA 51 and WA 53 have been approved by the City of Carlsbad in ROW Permit and Traffic Control Plan No. ROW2021-0869 submitted to the CPUC on January 19, 2022. Any damage to public roadways, including any curb damage, resulting from MPR-10 activities will be immediately repaired following completion of MPR-10 construction activities in accordance with APM PS-4.

Although the four Peruvian pepper trees proposed for removal are within SDG&E ROW, SDG&E will receive concurrence from the property owner (Rancho Carillo Masters Association) prior to the removal of the trees. Post-construction restoration of the trees and ornamental vegetation impacted by MPR-10 activities would be performed in coordination with the property owner. In accordance with the Stormwater Pollution Prevention Plan (SWPPP), the temporary disturbance associated with the MPR-10 work areas will be stabilized with a native seed mix.

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

Original Condition: The MPR-10 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 work areas have not changed since the Project was originally designed, however field constructability review revealed the need to utilize the MPR-10 work areas for the reasons described below.

Justification for Change:

- **WA 51:** The existing work area for Location 51 does not allow for enough space to perform construction activities on the east side of Location 51 due to the size of the pole and the equipment required to install the pole. WA 51 will be required for situating vehicles and equipment on the east side of the pole during the installation of dead-ends (located on the east side of the pole). The work area will also allow for adequate space to set up a guard structure for wire installation over Palomar Airport Road.
- **WA 52:** There are three areas labeled WA 52 to facilitate the installation of the corner pole and stringing of conductor at Location 51. One area is the slope between the two access road segments northwest of Location 52. It will be required to allow adequate space for one side of the 24-foot wide outriggers of the crane, which will be situated within SS 05 during the installation of the pole at Location 51. The crane does not have enough space within the access road to extend the outriggers without utilizing WA 52.

The portion of WA 52 on the west side of the area labeled, "Permanent Work Area" and south of Location 52 will connect the existing access road to a work area during the stringing of conductor. The portion of WA 52 on the east side of the area labeled, "Permanent Work Area" will be required to position stringing equipment in line with Location 51 during the wire pull from Locations 51-58.

- **WA 53:** During field review it was determined stringing site 05 needed to extend further east to create the angle required for adequate tension for the wire pull from Locations 25-51. Inadequate tension could cause strain on the arms of the new pole and new conductor and create safety concerns. The wire pulling rig would not be able to make the right turn into the work area from the access road entrance, therefore it will access WA 53 from the road using traffic control.
- **WA 54:** The existing work area at Location 54 does not allow for adequate space to perform construction activities at this location. The replacement direct-bury pole at Location 54 will be installed just north of the existing direct-bury pole in order to transfer the hardware and conductor from the existing pole to the replacement pole (See **Attachment C, MPR-10 Site Photographs**). Large equipment is not able to access the site from the south due to the steep slope, therefore WA 54 is needed to position equipment during pole and conductor installation activities. Since the new pole location cannot be accessed from Palomar Airport Road due to the steep slope and existing pole, the use of the existing access road to Location 54 is also critical to perform work at this location.

Maps & Figure: Refer to **Attachment B, MPR-10 Figure**, for a map of the proposed MPR-10 work areas. Refer to **Attachment C, MPR-10 Site Photographs**, for pictures of the current conditions of the MPR-10 work areas.

Environmental Impact: Utilization of the MPR-10 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. No special-status species were identified within the proposed MPR-10 work areas.

MPR-10 would result in 0.01 acre of habitat impact. Combined with the 0.53 acre of habitat impacts from MPRs 1-9, this results in a total of 0.54 acre of impacts deducted from the “habitat impact limit” set aside when the Project was approved, and 13.674 acres are remaining. Therefore, MPR-10 impacts would not cause the available acreage in the “habitat impact limit” to be exceeded.

MPR-10 would not result in credit drawdown from the SDG&E mitigation bank since impacts to habitat are less than 500 square feet (385 square feet). Therefore, total credit drawdown resulting from MPRs would remain at 0.52 acre, and 113.56 acres are remaining. Therefore, MPR-10 impacts would not cause the available mitigation credits to be exceeded.

Attachment D, Habitat Impact Limit and Mitigation Accounting, documents the total habitat impact and balance of the “habitat impact limit” as well as the total drawdown of mitigation credits resulting from the Project thus far.

Impacts to type of land cover resulting from MPR-10 are estimated in the table below:

MPR-10 Work Area	Low-Quality CSS	Disturbed Habitat	Bare Ground	Developed / Paved Ground	Ornamental	Total
WA 51	-	490 sf	-	300 sf	400 sf	1,190 sf (0.03 acre)
WA 52	-	5,080 sf	-	-	-	5,080 sf (0.11 acre)
WA 53	-	-	1,335 sf	635 sf	945 sf	2,915 sf (0.07 acre)
WA 54	385 sf	-	-	-	-	385 sf (0.01 acre)
Total:	385 sf (0.01 acre)	5,570 sf (0.13 acre)	1,335 sf (0.03 acre)	935 sf (0.02 acre)	1,345 sf (0.03 acre)	9,570 sf (0.22 acre)

According to the Project's Cultural Resources Monitoring Plan (CRMP), the proposed MPR-10 work areas are within an area determined to have a high potential for buried archaeological deposits. However, MPR-10 activities would not substantially increase the severity of impacts to cultural resources as ground disturbance was previously anticipated at Locations 51-54 in the IS/MND and NTP-1. Cultural and Native American monitoring will occur within the MPR-10 work areas during vegetation trimming and ground disturbing activities.

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-10 work areas are located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	<input type="checkbox"/> No Resources Present	<input checked="" type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference:			
<p>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-10 work areas on March 29, 2022. Consistent with Appendix E of the IS/MND, low-quality CSS is present within WA 54. The Project biologist verified that the current condition is consistent with the results provided in previous biological studies. There were no special-status plant or animal species observed during the pre-construction survey. Biological monitoring will take place during vegetation trimming and ground-disturbing activities in habitat in accordance with APM BIO-8.</p>			
Cultural	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Cultural Survey Report Reference:			
<p>Cultural resources within the Project's study area (including the MPR-10 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). WA 54 is located within a previously recorded archaeological site (recorded in 1985). Pedestrian surveys were completed for the Project's study area in February 2015 for the PEA and follow-up pedestrian surveys were performed in 2018. There were no cultural resources discovered in the vicinity of Location 54 during these surveys, and the site is assumed to have been destroyed by development. There are no known sensitive cultural resources within WA 51, WA 52 or WA 53, and no cultural resources were recorded at these locations during the pedestrian surveys. The MPR-10 work areas are located in an area determined to have a high potential for archaeological deposits. Therefore, cultural and Native American monitoring will take place for vegetation trimming and ground-disturbing activities in accordance with the CRMP.</p>			

Disturbance Acreage Changes: Yes No

MPR-10 would result in 9,570 square feet (0.22 acre) in temporary impacts of additional disturbance to the Project as approved. The temporary impacts proposed in MPR-10 do not overlap with the original impacts for the approved work areas at Locations 51-54.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Loc 51 (Original)	400 sf	38 sf	438 sf (0.01 acre)
Loc 52 (Original)	2,977 sf	-	2,977 sf (0.07 acre)
Loc 53 (Original)	8 sf	-	8 sf (< 0.01 acre)
Loc 54 (Original)	2,992 sf	4 sf	2,996 sf (0.07 acre)
Total (Original):	6,377 sf (0.15 acre)	42 sf (< 0.01 acre)	6,419 sf (0.15 acre)
WA 51 (New)	1,190 sf	-	1,190 sf (0.03 acre)
WA 52 (New)	5,080 sf	-	5,080 sf (0.11 acre)
WA 53 (New)	2,915 sf	-	2,915 sf (0.07 acre)
WA 54 (New)	385 sf	-	385 sf (0.01 acre)
Total (New):	9,570 sf (0.22 acre)	-	9,570 sf (0.22 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 checked="" type="checkbox"/> Y	<p>MPR-10 does not involve the installation of any new facilities or performance of any significantly different construction activities. There is no significant ground disturbance proposed as part of MPR-10 activities. Accordingly, utilization of the MPR-10 work areas would not create any new geologically-related hazard beyond what was previously disclosed in the Project's IS/MND, Section 3.7. Following the use of the MPR-10 work areas, the site will be stabilized in accordance with the SWPPP.</p> <p>As the proposed MPR-10 work areas are located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP), paleontological monitoring would take place during ground disturbance or at the discretion of the Project Paleontologist. Therefore, impacts to paleontological resources would remain similar to those disclosed within the Project's IS/MND, Section 3.7.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-10 would not require agency consultation relating to geology, soils, seismicity or paleontological resources.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	There are no new facilities or significantly different activities being proposed in MPR-10 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-10 work areas would not require any new potentially hazardous materials to

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	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).
Agency Consultation?	<input type="checkbox"/> Y	MPR-10 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input type="checkbox"/> Y	There are no jurisdictional or non-jurisdictional drainages that would be affected by the proposed MPR-10 work areas. MPR-10 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. Limiting vegetation trimming to no less than 4 inches within the temporary impact areas and keeping the root structure intact would also reduce the likelihood of erosion within the MPR-10 work areas.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-10 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	Review of the Project's previous cultural resources survey reports prepared for the PEA determined WA 54 is located within a previously recorded archaeological site (recorded in 1985). Pedestrian surveys were completed for the Project's study area in February 2015 for the PEA and follow-up pedestrian surveys were performed in 2018. There were no cultural resources discovered in the vicinity of Location 54 during these surveys, and the site is assumed to have been destroyed by development. There are no known sensitive cultural resources within WA 51, WA 52 or WA 53, and no cultural resources were recorded at these locations during the pedestrian surveys. The MPR-10 work areas are located in an area determined to have a high potential for archaeological deposits. Therefore, cultural monitoring would take place during vegetation trimming and ground-disturbing activities pursuant to the CRMP. Project impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5.
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-10 would not require agency or tribal consultation in relation to cultural resources.
	<input checked="" type="checkbox"/> N	
Tribal Cultural Resources	<input checked="" type="checkbox"/> Y	As stated in the previous section, the proposed MPR-10 work areas are located in an area determined to have a high potential for archaeological deposits that could include tribal cultural resources. Native American monitoring would take place during vegetation trimming and ground disturbing activities in accordance with the CRMP. Impacts would be similar to those disclosed within the Project's IS/MND, Section 3.18.
	<input 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.
Agency Consultation?	<input type="checkbox"/> Y	MPR-10 would not require agency or tribal consultation in relation to tribal cultural resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input checked="" type="checkbox"/> Y	<p>Locations 51-53 would be accessed via the existing access road entrance off Palomar Airport Road (within stringing site 05). Equipment that cannot access WA 51 or WA 53 via the access road entrance due to the angle of entry (concrete trucks, wire pulling equipment, etc.) will access directly from the road using traffic control. Traffic control activities to access WA 51 and WA 53 have been approved by the City of Carlsbad in ROW Permit and Traffic Control Plan No. ROW2021-0869 submitted to the CPUC on January 19, 2022.</p> <p>Although MPR-10 includes traffic control at this location, with the implementation of the requirements provided in the ROW Permit and Traffic Control Plan, impacts are anticipated to be similar to those disclosed in the IS/MND, Section 3.17. In addition, impacts related to traffic control activities on Palomar Airport Road were anticipated and analyzed in the IS/MND.</p> <p>The existing access road to Location 54 is also being proposed for use since it is not feasible to perform the required construction activities at Location 54 (drilling, concrete pour, pole installation, etc.) from the existing work area on Palomar Airport Road. SDG&E has an easement for this site which provides SDG&E the right to access their ROW and associated infrastructure using the existing access road entrance. The access road entrance is located in a parking lot for a business park. No construction vehicles or equipment would be staged within the parking lot. Although the use of the access road entrance was not originally included in the IS/MND Mapping, construction traffic impacts to the roads leading to the parking lot (Lionshead Avenue and Business Park Drive) were anticipated and analyzed in the IS/MND. This is because the location of the business park was an approved staging yard location in the IS/MND prior to its development.</p> <p>In compliance with APM PS-4, SDG&E would repair any damage to public roads (including any curb damage resulting from MPR-10 activities) following completion of construction activities. MPR-10 activities would not involve a schedule extension or significantly 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.</p>
Agency Consultation?	<input checked="" type="checkbox"/> Y	ROW Permit and Traffic Control Plan No. ROW2021-0869 has been acquired by the Project. Any revisions to the permit or plan would require consultation with the City of Carlsbad.
	<input 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.
Air Quality	<input type="checkbox"/> Y	MPR-10 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 significantly different activities proposed as part of this MPR-10 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-10 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 quality found in the San Diego Air Pollution Control District (SDAPCD) Regulation IV. Therefore, MPR-10 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-10 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	MPR-10 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-10 request that would cause a substantial increase in construction noise, and the proposed MPR-10 work areas are not within 100 feet of a sensitive receptor. All activities performed within the proposed MPR-10 work areas would take place in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP).
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-10 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	MPR-10 involves the removal of four ornamental Peruvian pepper trees and trimming of a fifth Peruvian pepper tree within WAs 51 and 53. The removal and trimming of the ornamental trees would create a visual change to the area in which Locations 51-53 are located. However, the existing trees do not serve as screening vegetation and would not expose pedestrians or motorists to a change in visual quality since the southern-facing view from Palomar Airport Road at this location is an open view of neighborhoods and undeveloped lands as discussed in Section 3.1.1 of the IS/MND. In addition, post-construction restoration of the trees and ornamental vegetation impacted by MPR-10 activities would be performed in coordination with the property owner. The overall visual sensitivity to this adjustment would be low and would not be expected to result in an impact to the existing visual character or quality of public views beyond what was analyzed in the IS/MND, Section 3.1.
	<input 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.
		<p>In addition, the MPR-10 work areas are not located within a Key Observation Point (KOP), scenic vista, or other scenic resource identified in the IS/MND. Therefore, MPR-10 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.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>MPR-10 would not require agency consultation relating to aesthetic and visual resources.</p>
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>Vegetation trimming will be required within the MPR-10 work areas, which will result in 385 square feet of impacts to CSS within WA 54. Trimming will be performed with both hand tools and a skid steer with a mower deck and vegetation would be trimmed to no less than 4 inches above the ground per the SDG&E NCCP Operational Protocol No. 36 (Section 7.1) to maintain the root structure and seed bank. In addition, four ornamental Peruvian pepper trees would be removed within WAs 51 and 53 and a fifth Peruvian pepper tree would be trimmed. Tree removal would take place using a chainsaw and a skid steer.</p> <p>MPR-10 would result in 0.01 acre of habitat impact. Combined with the 0.53 acre of habitat impacts from MPRs 1-9, this results in a total of 0.54 acre of impacts deducted from the "habitat impact limit" set aside when the Project was approved, and 13.674 acres are remaining. Therefore, MPR-10 impacts would not cause the available acreage in the "habitat impact limit" to be exceeded.</p> <p>MPR-10 would not result in credit drawdown from the SDG&E mitigation bank since impacts to habitat are less than 500 square feet (385 square feet). Therefore, total credit drawdown resulting from MPRs would remain at 0.52 acre, and 113.56 acres are remaining. Therefore, MPR-10 impacts would not cause the available mitigation credits to be exceeded.</p> <p>Attachment D, Habitat Impact Limit and Mitigation Accounting, documents the total habitat impact and balance of the "habitat impact limit" as well as the total drawdown of mitigation credits resulting from the Project thus far.</p> <p>MPR-10 would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. A biological monitor would be present during vegetation trimming and ground-disturbing activities in habitat per APM BIO-8. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-10 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

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.
		<ul style="list-style-type: none"> • APM BIO-4 • APM BIO-6 • APM BIO-7 • APM BIO-8 • 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-10 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	The MPR-10 work areas are not located within a CPUC High Fire Threat District (HFTD). However, SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention Plan and MM WIL-1, including restrictions and requirements for vegetation trimming and grubbing. In addition, there are no significantly new activities proposed, extension in work schedule, or increase in equipment or personnel required as a result of MPR-10. Therefore, MPR-10 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to wildfire that were already analyzed in the Project's IS/MND, Section 3.20.
	<input checked="" type="checkbox"/> N	
Agency Consultation	<input type="checkbox"/> Y	MPR-10 would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

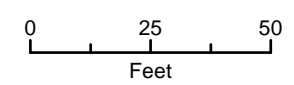
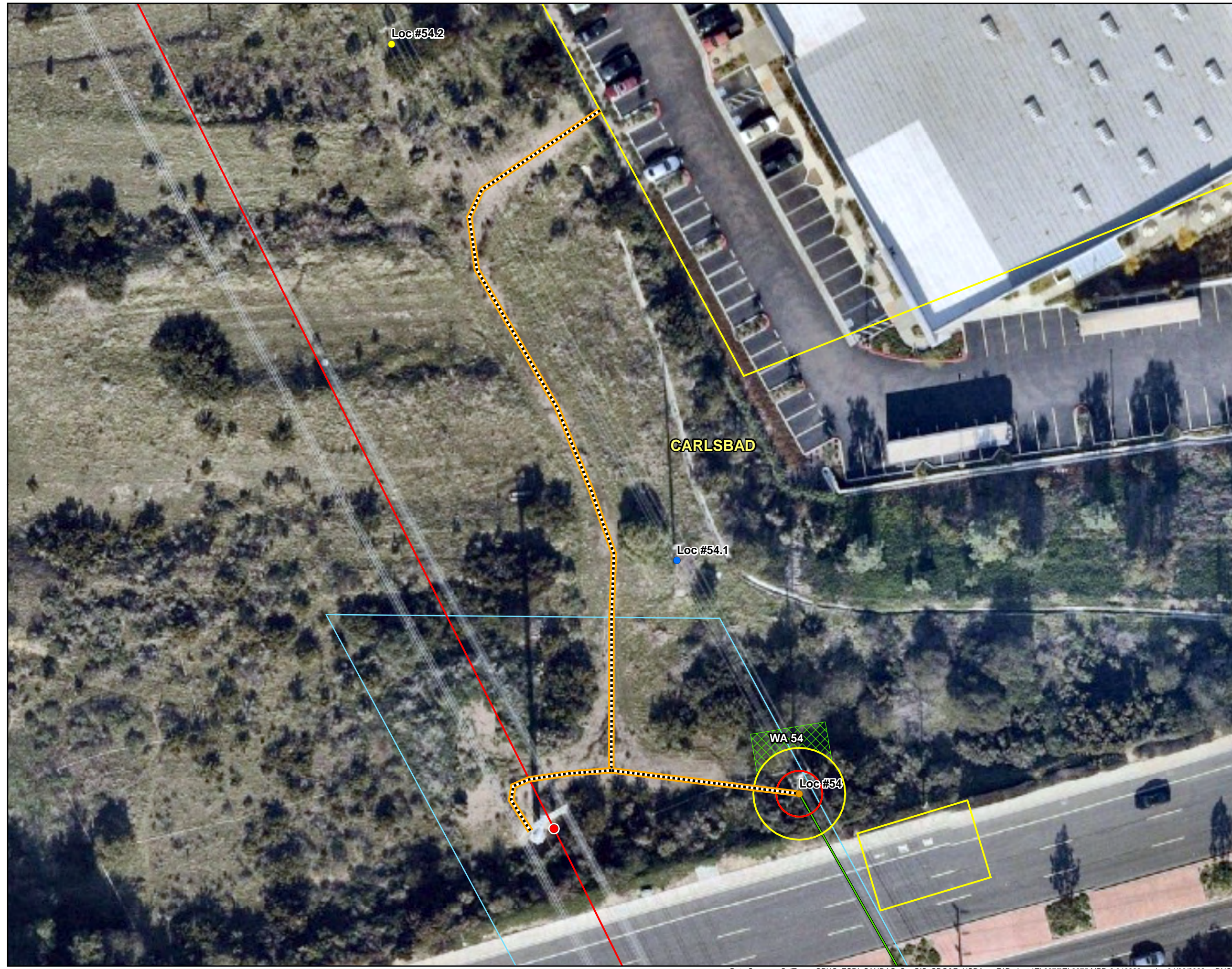
Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager		Melinda Kimble		<input type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager		William Yee		<input type="checkbox"/> Reviewed
CPUC Project Manager		Trevor Pratt		<input type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input type="checkbox"/> Refinement Approved		<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority
Conditions of Approval or Reason for Denial:				
Prepared by:			Date:	

ATTACHMENT B
MPR-10 Figure

**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR-10 Figure 1
Structure Location 54
San Diego County, CA

LEGEND

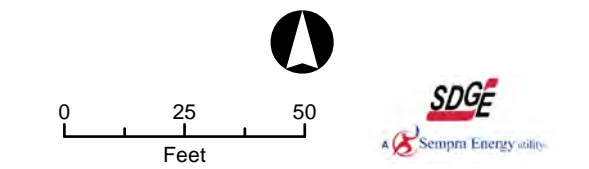
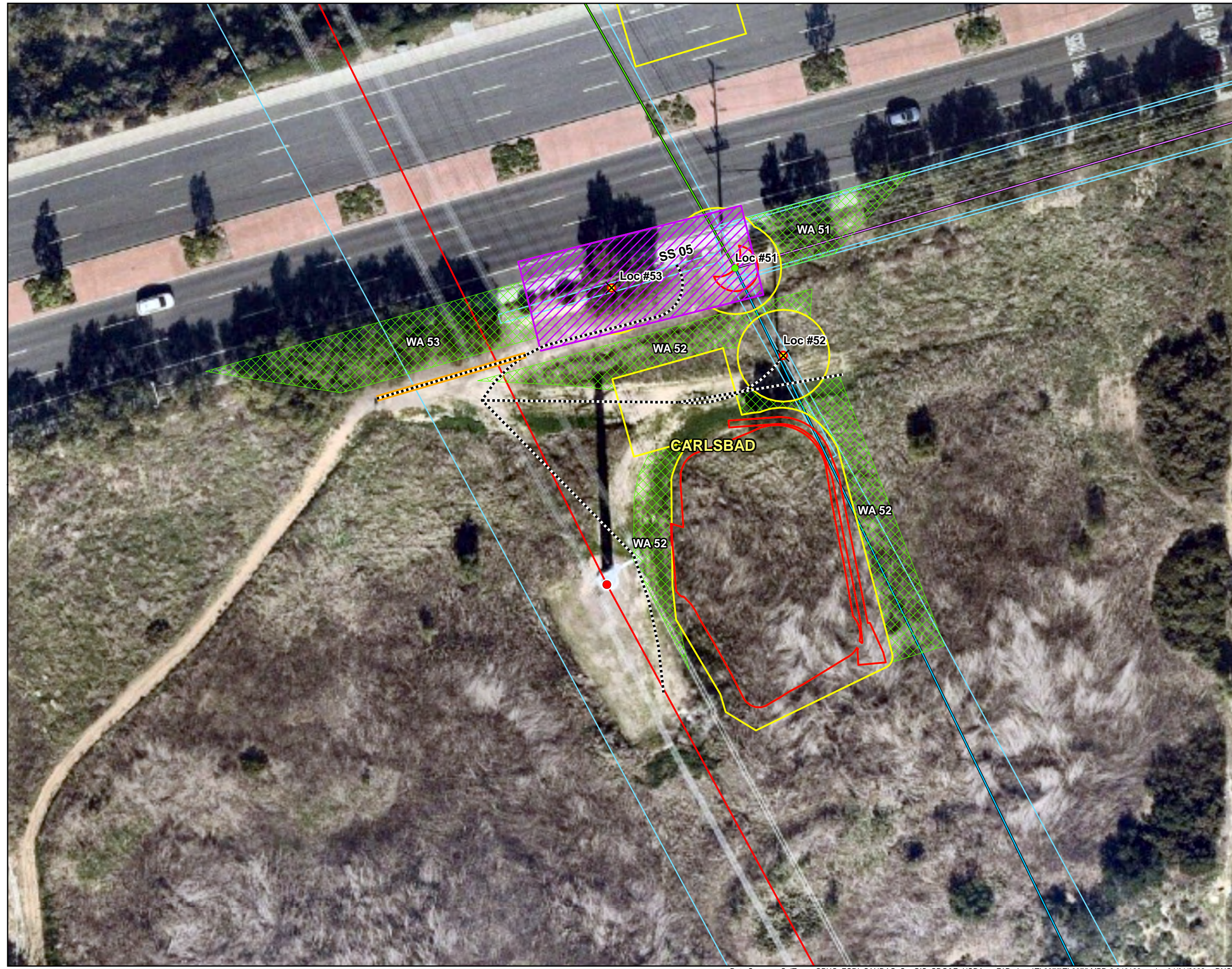
- Existing Structure
- Existing 138kV Transmission Line
- State Highway
- Proposed Project**
- Replace Existing with Pier Foundation
- Replace Existing with Direct Bury
- Pole Top Work
- No Work / Information Only
- ✗ Remove From Service
- Segment 2 - New Build
- Segment 3 - Reconductor / Re-energize
- - - - - Existing Access Road
- Temporary Work Area
- Permanent Work Area or Grading Impacts
- Stringing Site
- Existing ROW
- MPR-10 Component**
- Access Road Extension
- Additional Temporary Work Area



**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR-10 Figure 2
Structure Location 51
San Diego County, CA

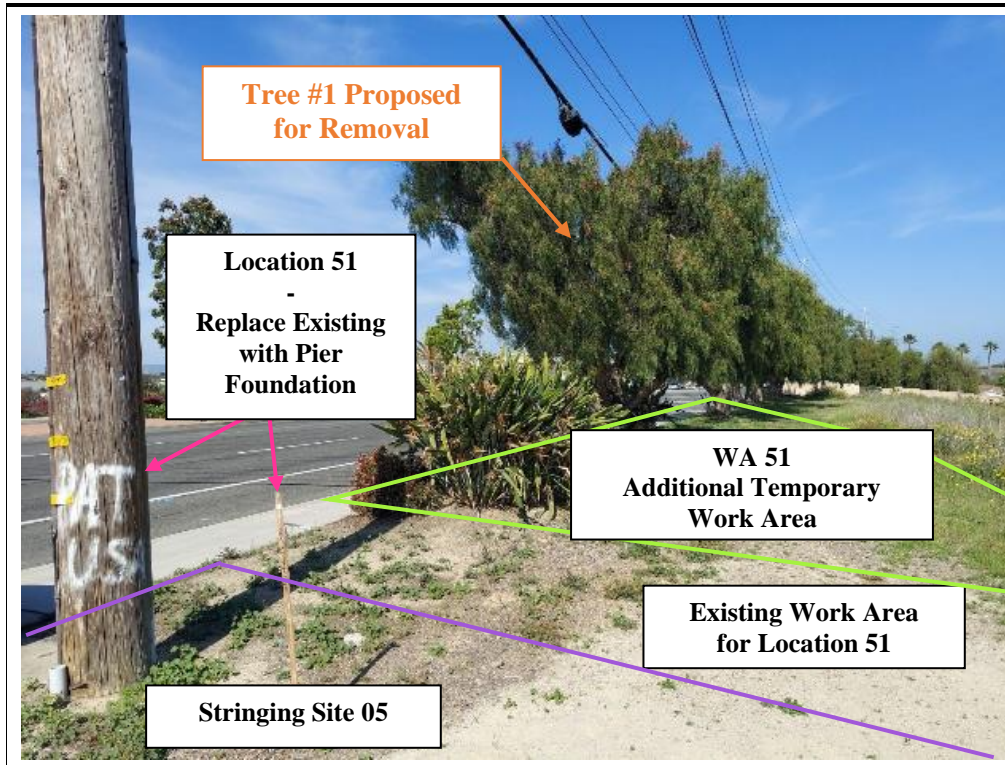
LEGEND

- Existing Structure
- Existing 138kV Transmission Line
- State Highway
- Proposed Project**
- Replace Existing with Pier Foundation
- Replace Existing with Direct Bury
- No Work / Information Only
- ✗ Remove From Service
- Segment 2 - New Build
- Segment 3 - Reconductor / Re-energize
- - - Existing Access Road
- Temporary Work Area
- Permanent Work Area or Grading Impacts
- Stringing Site
- Existing ROW
- MPR-10 Component**
- Access Road Extension
- Additional Temporary Work Area

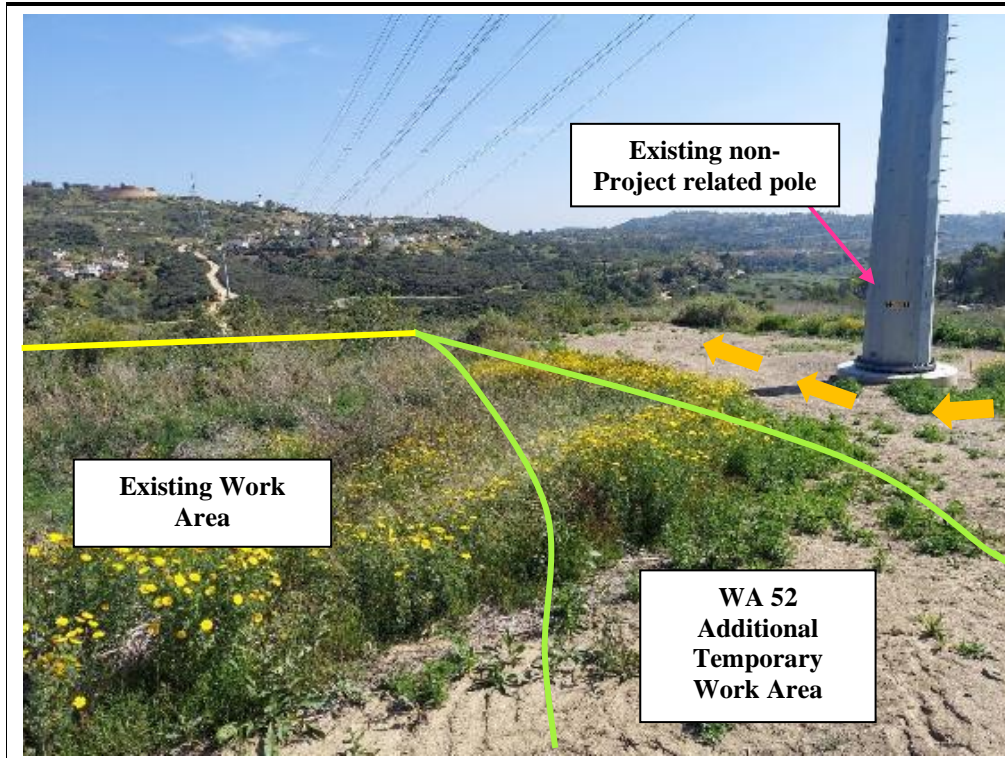


ATTACHMENT C
MPR-10 Site Photographs

MPR-10 PHOTO LOG

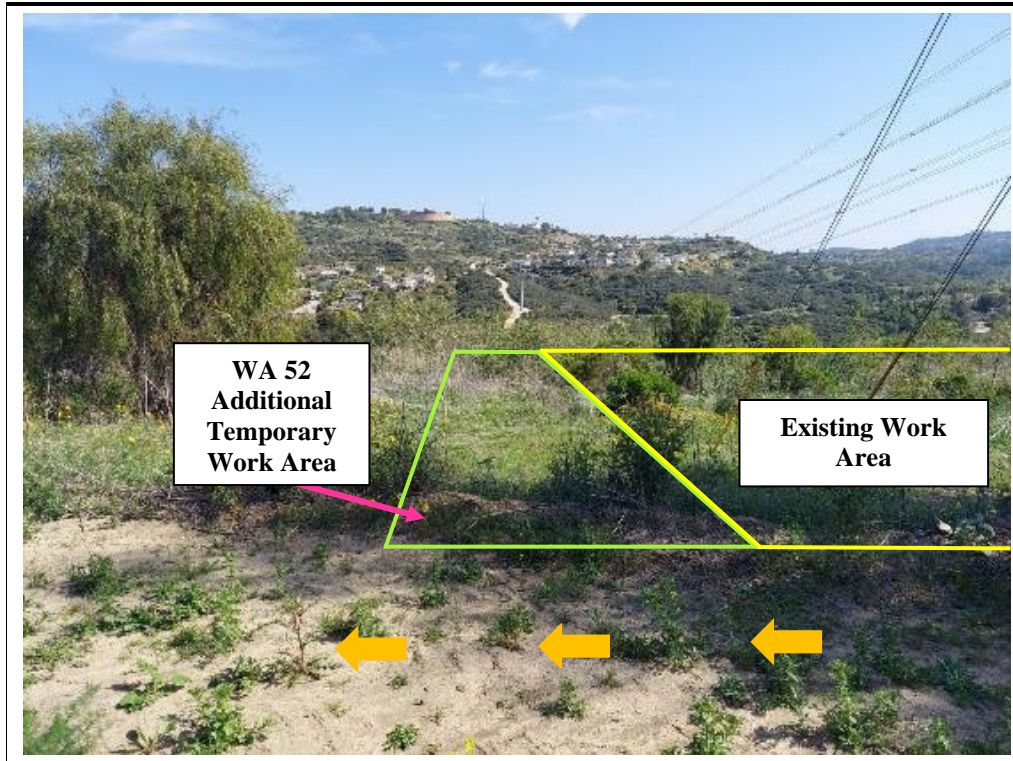


Photograph 1:
View of Location 51 and the additional temporary work area in green (WA 51). The Peruvian pepper tree that will be removed within WA 51 is also shown. Facing: NE

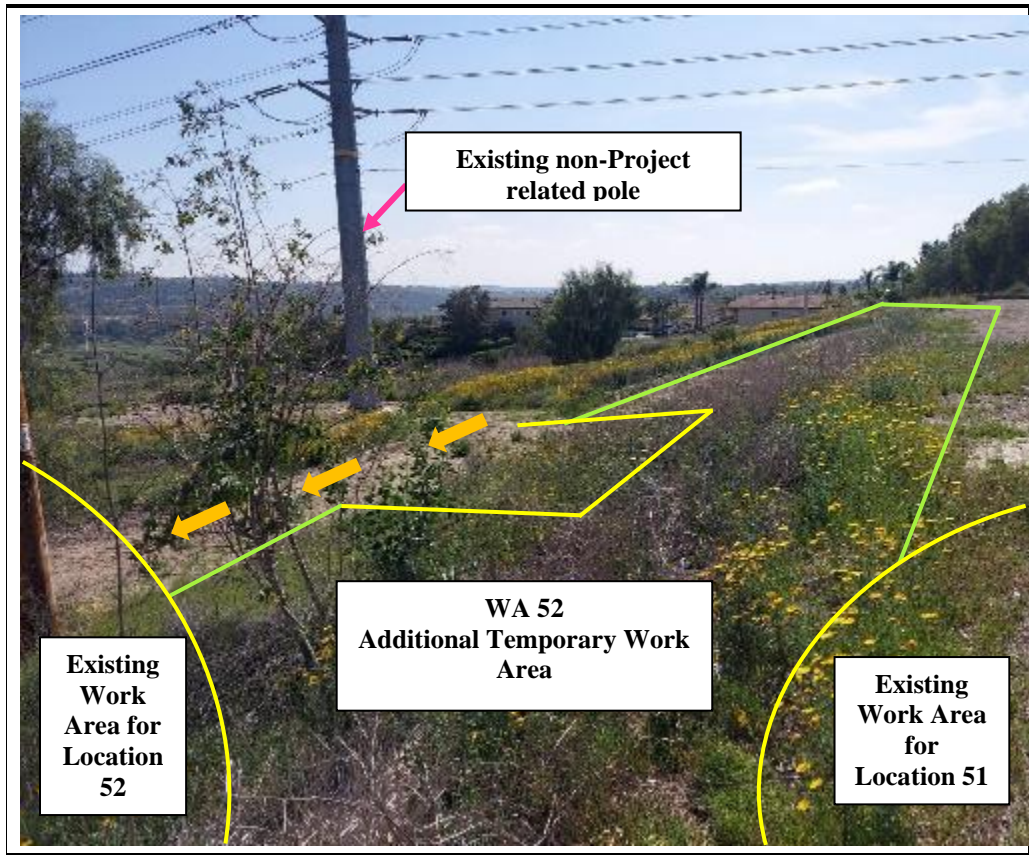


Photograph 2:
View of additional temporary work area in green (WA 52), existing access road, and non-Project related existing pole. Facing: SW

MPR-10 PHOTO LOG



Photograph 3:
View of additional temporary work area in green (WA 52), existing work area and existing access road. Arrows point in the direction of Location 52. Facing: S



Photograph 4:
View of additional temporary work area in green (WA 52), existing work areas for Locations 51 and 52 in yellow and existing non-Project related pole in the background. Arrows point in the direction of Location 52. Facing: W

MPR-10 PHOTO LOG



Photograph 5:
View of additional temporary work area in green (WA 53) and Peruvian pepper trees to be removed and trimmed within WA 53. Facing: W



Photograph 6:
View of existing SDG&E entrance to the access road that leads to Location 54. The curb will be modified using a wooden ramp. Facing: SW

MPR-10 PHOTO LOG



Photograph 7:

View of existing access road to Location 54 and additional temporary work area in green (WA 54). Facing: E



Photograph 8:

View of existing access road to the maintenance pad for the existing non-Project related pole west of Location 54. Facing: SW

ATTACHMENT D
Habitat Impact Limit and Mitigation Accounting



TO: Trevor Pratt
FROM: William Yee
SUBJECT: Attachment D to MPR-10: Accounting for the “Take Limit” and Mitigation Credits under the SDG&E LE-HCP

DATE: April 13, 2022

The information provided in this memo documents the accounting for two separate conditions of the SDG&E 2017 Low Effect Habitat Conservation Plan (LE-HCP or Plan) in accordance with Mitigation Measure BIO-1 for the TL6975 Project, which states the following:

Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts. Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA).

If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies.

There are two conditions or terms of use for the SDG&E 2017 LE-HCP and the accompanying ESA Section 10(a)(1)(A) “Take” permit (Permit). One condition is the establishment of a mitigation bank or the purchase of high-quality habitat for the sole purpose of conserving listed species. The acreage is referred to as credits and these credits are debited to mitigate for actual impacts as projects are realized. The Natural Communities Conservation Plan (NCCP) and LE-HCP have combined mitigation credits of 117.008 acres as reported in the 2020 Annual Report (See **Table 1**). An Annual Report is a requirement of the Plan and submitted to the wildlife agencies the year following the reporting year.

It is important to note, the accounting provided herein is an estimate and the Post-Construction Survey Report for the TL6975 Project will provide actual mitigation credits and the actual impacts to habitat to be subtracted from the mitigation bank and the “habitat impact limit” respectively.

Table 1 below is a table found in the 2020 Annual Report, and it was provided in the letter to the CPUC as Attachment C to the Notice to Proceed No. 1 (NTP-1) on June 18, 2021. As required by the Plan, the TL6975 San Marcos to Escondido Project has submitted a Pre-activity Survey Report to the wildlife agencies reporting approximately 2.93 acres of

estimated mitigation credits that could potentially be withdrawn as a result of the Project as approved (see **Table 2**).

Table 1. Accounting of Mitigation Credits on an Annual Basis

NCCP/LE-HCP Mitigation Bank		
Year	Remaining Mitigation Bank (Acres)	Deduction (Acres) Annually
2017*	195.783	0.000
2017 (NCCP)	191.320	4.463
2017 (LE-HCP)	191.307	0.013
2017 (Enhancement Program)	191.477	9.830
2018 (NCCP)	169.375	12.102
2018 (LE-HCP)	169.112	0.263
2019 (NCCP)	168.781	0.331
2019 (LE-HCP)	168.484	0.297
2020 (NCCP)	168.386	0.098
2020 (Enhancement Program)	151.543	16.843
2020 (LE-HCP)	117.008	34.535

*SDG&E purchased 280 acres of mitigation in 1995 as a part of the NCCP permit; the mitigation parcels are referred to as the Otay Lakes and Willow Glen Mitigation Banks. In 2015, SDG&E purchased an additional 114 acres of mitigation, often referred to as the Cielo Property. This purchase has been reflected in SDG&E's remaining mitigation credits from 2017 onwards.

Table 2 below provides the Project impacts to be mitigated as estimated (in gray) under “Project as approved” and the impacts to be mitigated resulting from or being proposed in the Minor Project Refinements (MPRs). MPR-10, as proposed, would not result in mitigation credit drawdown as the proposed impacts are less than 500 square feet. Therefore, the total credit drawdown resulting from MPRs thus far is 0.52 acre. With the total mitigation credits of 117.008 acres being available in 2020 (see **Table 1**), the withdrawal of 3.45 acres would result in a balance of 113.56 acres and SDG&E’s coverage of mitigation credits would remain sufficient to support the Project. Please note, MPRs 7-9 did not result in any impacts to habitat, therefore they are not included in the accounting for **Table 2** below.

Table 2. Accounting of Mitigation Credits Resulting from MPRs

MPRs	Total Permanent Impacts (sf)	Total Permanent Impacts Credit Withdrawal (sf)	Total Temporary Impacts (sf)	Total Temporary Impacts Credit Withdrawal (sf)	Total Temporary Impacts for Enhancement (sf)	Mitigation Credits Subtotal in square feet (sf)	Totals in Acres (ac)	Estimated Remaining Acreage Mitigation Credits (From 117.008 acres)
Project as approved	55,794	88,392	47,794	4,274	34,996	127,662	2.93	114.08
MPR-1	-	-	11,250	-	11,250	11,250	0.26	113.82
MPR-2	-	-	3,875*	-	-	-	-	113.82
MPR-3	-	-	1,700	-	1,700	1,700	0.04	113.78
MPR-4	-	-	1,183*	-	750	750	0.02	113.76
MPR-5	1,100	2,200	710	-	710	2,910	0.07	113.69
MPR-6	2,850	5,700	268*	-	-	5,700	0.13	113.56
MPR-10	-	-	385*	-	-	-	-	113.56
Total	59,744	96,292	67,165	4,274	49,406	149,972	3.45	113.56

*Mitigation credits are not withdrawn when the area of impact is outside of a defined Preserve or outside of Preserve quality habitat if a defined Preserve is not designated. In addition, if impacts at one site are less than 500 square feet, mitigation is not required. Land cover such as bare ground, landscaping, disturbed vegetation, etc. does not require mitigation or take credits.

The other condition of the Plan and Permit is the accounting of impacts allowed under the 10(a)(1)(A) “Take” permit. A maximum of 60 acres of Covered Species habitat can be temporarily or permanently impacted under the Permit for this LE- HCP, otherwise referred to as the “habitat impact limit.”

Table 3 below is a table in the 2020 Annual Report and it was provided in the letter to the CPUC as Attachment C to the Notice to Proceed No. 1 (NTP-1) on June 18, 2021 (included). In this letter, it was documented that 34.867 acres remained of the “habitat impact limit” as documented in the 2020 Annual Report. In addition, SDG&E estimated an additional 17.653 acres of impacts would be applied in 2021 pending final calculations; therefore, this leaves an estimated 17.214 acres remaining for 2022. For the TL6975 project, it was estimated in the Initial Study / Mitigated Negative Declaration (IS/MND) that 2.5 acres of habitat would be impacted, but to account for unforeseen circumstances, an additional 0.5 acre was included to bring the total to three acres. It is important to note that all staging yards and work areas, regardless of whether they are being used or not, are included in the Project’s estimated impact total of three acres (See **Table 4**).

Table 3. Accounting of “Habitat Impact Limit” as reported on an Annual Basis

LE-HCP Impact Bank		
Year	Remaining Mitigation Bank (Acres)	Deduction (Acres) Annually
2016	60.00	0.000
2017	59.801	0.199
2018	58.090	1.711
2019	56.462	1.628
2020	34.867	21.595

Table 4 below provides the Project impacts to habitat as estimated (in gray) under “Project as approved” and the impacts to habitat resulting from or being proposed in the MPRs. MPR-10 as proposed would result in 0.01 acre of habitat being impacted. Combined with the 0.53 acre of habitat impact from MPRs 1-6, this results in a total of 0.54 acre of impacts deducted from the “habitat impact limit” and a balance of 13.674 acres remaining. Therefore, the MPR-10 impacts would not cause the available acreage to be exceeded, and thus SDG&E’s coverage for the habitat impact limit would remain sufficient to support the Project. Please note, MPRs 7-9 did not result in any impacts to habitat, therefore they are not included in the accounting for **Table 4** below.

Table 4. Accounting of “Take Limit” Deductions Resulting from MPRs

MPR	Coastal Sage Scrub (CSS) (Acres)	Coast Live Oak Woodland (CLOW) (Acres)	Southern Maritime Chaparral (SMC) (Acres)	Eucalyptus Woodland (Acres)	Non-native Grassland (Acres)	Additional Take Added for Unforeseen Circumstances (Acres)	Total Take Set Aside for TL6975 (Acres)	MPR Habitat Impact Total (Acres)	Estimated Remaining Acreage in Take Limit (From 17.214 acres)
Project as Approved	1.6	0	0.7	0.1	0.1	0.5	3.00	-	14.214
MPR-1	0.26	-	-	-	-	-	-	0.26	13.954
MPR-2	0.09	-	-	-	-	-	-	0.09	13.864
MPR-3	0.02	0.02	-	-	-	-	-	0.04	13.824
MPR-4	0.01	-	0.02	-	-	-	-	0.03	13.794
MPR-5	0.04	-	-	-	-	-	-	0.04	13.754
MPR-6	0.07	-	-	-	-	-	-	0.07	13.684
MPR-10	0.01	-	-	-	-	-	-	0.01	13.674
Total:	2.0	0.02	0.72	0.1	0.1	0.5	3.00	0.54	13.674