



William Yee
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May 11, 2022

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

Re: Minor Project Refinement No. 11 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. 11 (MPR-11) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-11 will authorize the use of additional work areas at Locations 2.1, 3 and 7 to facilitate pole and overhead wire installation activities in Segment 1. The requested additional work areas total 2,451 square feet, or 0.06 acre. Please refer to **Attachment B, MPR-11 Figure** and **Attachment C, MPR-11 Site Photographs** to view the MPR-11 work areas.

- Attachment A: MPR-11 Form
- Attachment B: MPR-11 Figure
- Attachment C: MPR-11 Site Photographs

Description of MPR-11 Workspace and Activities

As stated above, SDG&E is requesting approval of MPR-11 for additional work areas to facilitate pole and overhead wire installation activities at Locations 2.1, 3 and 7 in Segment 1 on the TL6975 San Marcos to Escondido Project (Project).

- **Location 2.1 Additional Work Area (WA 2.1):** WA 2.1 is a circular work area with a 10-foot radius around Location 2.1. Location 2.1 is changing from a designation of “No Work/Information Only” (as shown in the NTP-1 Mapbook) to “Overhead Work” as overhead fiber work will likely be required at this location. The overhead work would be performed from the street using a bucket truck. The location of the bucket truck and associated traffic control will be determined in the forthcoming right-of-way (ROW) Permit and Traffic Control Plan issued by the County of San Diego. No vegetation trimming is anticipated within WA 2.1.

- Location 3 Additional Work Area (WA 3):** WA 3 is immediately northeast of Stringing Site 01 and southeast of Location 3 on SDG&E property. This expanded work area will be utilized to position equipment (water truck, drill rig, etc.) during pole installation and wire pulling activities at Location 3. Within WA 3 and along the perimeter of San Marcos Substation, there is landscaping planted by SDG&E comprised of African sumac trees, juniper shrub understory, and mature olive trees. Three African sumac trees and the juniper shrub understory will need to be removed (grubbed), and two mature olive trees will need to be trimmed (see **Attachment C** for an overview of vegetation). The African sumac tree removals would take place using a chainsaw and a skid steer or similar equipment. Stormwater Pollution Prevention Plan (SWPPP) BMPs would be installed to prevent off-site sedimentation in areas where the vegetation is being removed or grubbed.
- Location 7 Additional Work Area (WA 7):** WA 7 is located west of Location 7 immediately adjacent to the approved work area for Location 7. The additional work area will be utilized to stockpile spoils from the foundation excavation for the pier foundation at Location 7. A silt fence will be installed around the perimeter of WA 7 to protect from any runoff into the nearby jurisdictional aquatic feature. The ornamental acacia shrub within WA 7 will be trimmed down to create space for the spoils stockpile. SDG&E has received approval from the property owner (San Marcos High School) to trim the ornamental vegetation within WA 7. 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).

Grading will not occur within the MPR-11 work areas. Post-construction restoration of WA 3 will be performed in coordination with SDG&E's substation group and restoration of WA 7 will be performed in coordination with San Marcos High School.

Any damage to sidewalks or public roadways resulting from MPR-11 activities, including any curb damage, will be immediately repaired following completion of MPR-11 construction activities in accordance with APM PS-4. The temporary disturbance associated with the MPR-11 work areas will be stabilized in accordance with the SWPPP.

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 will be approved by San Diego County in a ROW Permit and Traffic Control Plan which will be submitted to the CPUC prior to the start of traffic control activities. Post-construction restoration of the trees and ornamental vegetation impacted by MPR-11 activities would be performed in coordination with the property owners.

MPR-11 Request for Approval

SDG&E respectfully requests approval of MPR-11 for the approval of additional work areas at Locations 2.1, 3 and 7 by May 24, 2022. MPR-11 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-11 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: May 11, 2022

Report No.: 11

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s):

- The Location 2.1 Additional Work Area (WA 2.1) is located partially within SDG&E property and partially within the public right-of-way (ROW) at the San Marcos Substation.
- The Location 3 Additional Work Area (WA 3) is located on SDG&E property at the San Marcos Substation.
- The Location 7 Additional Work Area (WA 7) is located on San Marcos High School property.

Location/Milepost: The MPR-11 work areas are located in the City of San Marcos on Discovery Street.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed Minor Project Refinement No. 11 (MPR-11) work areas are estimated as follows:

- WA 2.1 – 314 square feet (0.01 acre) in developed, bare ground and ornamental vegetation.
- WA 3– 1,650 square feet (0.04 acre) in bare ground and ornamental vegetation.
- WA 7 – 487 square feet (0.01 acre) in ornamental vegetation.

Sensitive Resources: There is a jurisdictional aquatic feature (San Marcos Creek) and an archaeological site adjacent to WA 7.

Modification
From:

Permit

Plan/Procedure

Specification

Drawing

Mitigation
Measure

Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-11 for additional work areas to facilitate pole and conductor installation activities at Locations 2.1, 3 and 7 on the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-11 Figure** and **Attachment C, MPR-11 Site Photographs**, for an overview of the proposed MPR-11 work areas.

- **Location 2.1 Additional Work Area (WA 2.1):** WA 2.1 is a circular work area with a 10-foot radius around Location 2.1. Location 2.1 is changing from a designation of “No Work/Information Only” (as shown in the NTP-1 Mapbook) to “Overhead Work” as overhead fiber work will likely be required at this location. The overhead work would be performed from the street using a bucket truck. The location of the bucket truck and associated traffic control will be determined in the forthcoming right-of-way (ROW) Permit and Traffic Control Plan issued by the County of San Diego. No vegetation trimming is anticipated within WA 2.1.
- **Location 3 Additional Work Area (WA 3):** WA 3 is immediately northeast of Stringing Site 01 and southeast of Location 3 on SDG&E property. This expanded work area will be utilized to position equipment (water truck, drill rig, etc.) during pole installation and wire pulling activities at Location 3. Within WA 3 and along the perimeter of San Marcos Substation, there is landscaping planted by SDG&E comprised of African sumac trees, juniper shrub understory, and mature olive trees. Three African sumac trees and the juniper shrub understory will need to be removed (grubbed), and two mature olive trees will need to be trimmed (see **Attachment C** for an overview of vegetation). The African sumac tree removals would take place using a chainsaw and a skid steer or similar equipment. Stormwater Pollution Prevention Plan (SWPPP) BMPs would be installed to prevent off-site sedimentation in areas where the vegetation is being removed or grubbed.
- **Location 7 Additional Work Area (WA 7):** WA 7 is located west of Location 7 immediately adjacent to the approved work area for Location 7. The additional work area will be utilized to stockpile spoils from the foundation excavation for the pier foundation at Location 7. A silt fence will be installed around the perimeter of WA 7 to protect from any runoff into the nearby jurisdictional aquatic feature. The ornamental acacia shrub within WA 7 will be trimmed down to create space for the spoils stockpile. SDG&E has received approval from the property owner (San Marcos High School) to trim the ornamental vegetation within WA 7. 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).

Grading will not occur within the MPR-11 work areas. Post-construction restoration of WA 3 will be performed in coordination with SDG&E’s substation group and restoration of WA 7 will be performed in coordination with San Marcos High School.

Any damage to sidewalks or public roadways resulting from MPR-11 activities, including any curb damage, will be immediately repaired following completion of MPR-11 construction activities in accordance with APM PS-4. The temporary disturbance associated with the MPR-11 work areas will be stabilized in accordance with the SWPPP.

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

Original Condition: The MPR-11 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-11 work areas for the reasons described below.

Justification for Change:

- **WA 2.1:** When the Project was designed, there was no work anticipated to be required at the existing pole, Location 2.1. However, in constructability review it was determined that overhead fiber work would likely be required as part of overhead wire installation activities in Segment 1 and the San Marcos Substation. The proposed overhead work would be performed with a bucket truck from the road.
- **WA 3:** WA 3 will be required to stage equipment such as a water truck and drilling equipment, which will be utilized during drilling and foundation installation activities. Utilization of WA 3 for this work will allow the equipment to be stored overnight within the construction fencing. In addition, WA 3 is needed to manage the anchors for Location 3, as well as laydown of wire spools and equipment during wire pulling activities within Stringing Site 01.
- **WA 7:** During field review it was determined that there was no available workspace at Location 7 for soil stockpiling during drilling activities. All currently approved workspace will be utilized for staging materials and equipment, such as the drill rig. WA 7 is the best available option for an additional work area because it is adjacent to the approved work area where the drill can easily offload spoils, but away from the boundary of the nearby jurisdictional aquatic feature, San Marcos Creek.

Maps & Figure: Refer to **Attachment B, MPR-11 Figure**, for a map of the proposed MPR-11 work areas. Refer to **Attachment C, MPR-11 Site Photographs**, for pictures of the current conditions of the MPR-11 work areas.

Environmental Impact: Utilization of the MPR-11 work areas would not substantially increase the severity of any impacts disclosed within the IS/MND; would not create a new significant impact, 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-11 work areas. MPR-11 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.

Impacts to type of land cover resulting from MPR-11 are estimated in the table below:

MPR-11 Work Area	Bare Ground	Developed / Paved Ground	Ornamental	Total
WA 2.1	38 sf	270 sf	6 sf	314 sf (0.01 acre)
WA 3	350 sf	-	1,300 sf	1,650 sf (0.04 acre)
WA 7	-	-	487 sf	487 sf (0.01 acre)
Total:	388 sf (0.01 acre)	270 sf (0.01 acre)	1,793 sf (0.04 acre)	2,451 sf (0.06 acre)

There is an existing archaeological site adjacent to WA 7, where WA 7 was within the original site boundary. Subsurface testing was conducted at WA 7 in 2018 and results were negative for archaeological deposits, therefore the site boundary was changed to exclude WA 7. However, WA 7 is still within the associated cultural Environmentally Sensitive Area (ESA), so cultural and Native American monitoring will occur within WA 7 during vegetation trimming activities in accordance with the Cultural Resource Monitoring Plan (CRMP). WA 2.1 and WA 3 are not located in a culturally sensitive area and cultural monitoring is not required.

WA 7 is located adjacent to San Marcos Creek, a jurisdictional aquatic feature, which supports wetland and riparian habitat. A silt fence will be installed around WA 7 to prevent runoff into the aquatic feature consistent with the SWPPP, and MPR-11 activities will be spot checked daily by a biological monitor.

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-11 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-11 work areas on April 27, 2022. Consistent with Appendix E of the IS/MND, there is no habitat located within the MPR-11 work areas. The Project biologist verified that the current condition is consistent with the results provided in previous biological studies. Due to the proximity of WA 7 to a jurisdictional aquatic feature, San Marcos Creek, and associated riparian habitat, daily biological spot checks should occur during use of WA 7. Biological monitoring is not anticipated for use of WA 2.1 or WA 3. There were no special-status plant or animal species observed during the pre-construction survey. Pre-construction nesting bird surveys will take place prior to vegetation trimming activities associated with MPR-11 during the nesting season (February 15 – August 15) in accordance with APM BIO-6.</p>			
Cultural	<input type="checkbox"/> No Resources Present	<input checked="" 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-11 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 and follow-up pedestrian surveys were performed in 2018. There are no known sensitive cultural resources within the MPR-11 work areas. However, there is an existing archaeological site adjacent to WA 7, where WA 7 was within the original site boundary. Subsurface testing was conducted at WA 7 in 2018 (three shovel test pits) and results were negative for archaeological deposits, therefore the site boundary was changed to exclude WA 7. WA 7 is still within the associated cultural ESA, so cultural and Native American monitoring will occur within WA 7 during vegetation trimming activities in accordance with the CRMP. WA 2.1 and WA 3 are not located in a culturally sensitive area and cultural monitoring is not required.</p>			

Disturbance Acreage Changes: Yes No

MPR-11 would result in 2,451 square feet (0.06 acre) in temporary impacts of additional disturbance to the Project as approved. The temporary impacts proposed in MPR-11 do not overlap with the original impacts for the approved work areas at Locations 3 or 7. There were no impacts originally anticipated at Location 2.1 because no work was anticipated.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Loc 2.1 (Original)	-	-	-
Loc 3 (Original)	1,295 sf	33 sf	1,328 sf (0.03 acre)
Loc 7 (Original)	2,830 sf	50 sf	2,880 sf (0.07 acre)
Total (Original):	4,125 sf (0.09 acre)	83 sf (< 0.01 acre)	4,208 sf (0.10 acre)
WA 2.1 (New)	314 sf	-	314 sf (0.01 acre)
WA 3 (New)	1,650 sf	-	1,650 sf (0.04 acre)
WA 7 (New)	487 sf	-	487 sf (0.01 acre)
Total (New):	2,451 sf (0.06 acre)	-	2,451 sf (0.06 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	<p>MPR-11 does not involve the installation of any new facilities or performance of any significantly different construction activities. There is no significant ground disturbance or excavation proposed as part of MPR-11 activities. Accordingly, utilization of the MPR-11 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-11 work areas, the sites will be stabilized in accordance with the SWPPP.</p> <p>The proposed MPR-11 work areas are located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP). However, paleontological monitoring is not anticipated to be required because per the PRMMP, only excavations greater than 10 feet would require monitoring in these areas. Any ground disturbance associated with MPR-11 activities would be minimal, resulting from vegetation trimming, grubbing and the use of heavy equipment onsite. Therefore, impacts to paleontological resources would remain similar to those disclosed within the Project's IS/MND, Section 3.7.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-11 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-11 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-11 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-11 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input checked="" type="checkbox"/> Y	<p>WA 7 is located adjacent to San Marcos Creek, a jurisdictional aquatic feature. A silt fence will be installed around WA 7 to prevent runoff into the aquatic feature, and MPR-11 activities will be spot checked daily by an aquatic monitor. WA 7 will be used for stockpiling spoils from the foundation excavation at Location 7, and no excavations or significant ground disturbance will take place within WA 7. Limiting vegetation trimming to no less than 4 inches within WA 7 and keeping the root structure intact would also reduce the likelihood of erosion. Additionally, per MM BIO-3, if a rain event takes place during MPR-11 activities at WA 7, monitoring shall take place during the rain event to confirm the integrity of the silt fencing and to verify runoff does not enter the jurisdictional area.</p> <p>There are no jurisdictional or non-jurisdictional drainages that would be affected by the use of WA 2.1 or WA 3. MPR-11 activities 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. In addition, BMPs would be installed to prevent off-site sedimentation in areas where the vegetation is being removed or grubbed within WA 3.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-11 would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	<p>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-11 work areas. However, there is an existing archaeological site adjacent to WA 7, where WA 7 was within the original site boundary. Subsurface testing was conducted at WA 7 in 2018 (three shovel test pits) and results were negative for archaeological deposits, therefore the site boundary was changed. WA 7 is still within the associated cultural ESA, so cultural and Native American monitoring will occur within WA 7 during vegetation trimming activities in accordance with the CRMP. WA 2.1 and WA 3 are not located in a culturally sensitive area and cultural monitoring is not required. Project impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-11 would not require agency or tribal consultation in relation to cultural resources.
	<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.
Tribal Cultural Resources	<input checked="" type="checkbox"/> Y	As stated in the previous section, WA 7 is located within a cultural ESA and Native American monitoring would take place during vegetation trimming 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	
Agency Consultation?	<input type="checkbox"/> Y	MPR-11 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>WA 2.1 and WA 3 would be accessed from Discovery Street. Traffic control would be required for overhead work at Location 2.1 as the bucket truck would be situated within the roadway. However, it is not anticipated that the work would require an entire lane to be taken since there is a fire lane adjacent to the road where Location 2.1 is located. This work would only take a day or two to complete. The use of WA 7 would not result in any change to traffic and circulation impacts at Location 7. All traffic control activities would be approved through a ROW Permit and Traffic Control Plan issued by the City of San Marcos. Therefore, 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 Discovery Street were anticipated and analyzed in the IS/MND.</p> <p>In compliance with APM PS-4, SDG&E would repair any damage to public roads, sidewalks or curbs resulting from MPR-11 activities following completion of construction activities. MPR-11 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	A ROW Permit and Traffic Control Plan will be issued by San Diego County prior to any traffic control activities on Discovery Street.
	<input type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	MPR-11 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-11 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-11 work areas. These requirements include, but are not limited to, 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-11 would not affect air quality or emissions in a
	<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.
		manner substantially different from the impacts assessed as part of the Project's IS/MND.
Agency Consultation?	<input type="checkbox"/> Y	MPR-11 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input checked="" type="checkbox"/> Y	Locations 2.1 and 3 are within 100 feet of sensitive receptors and noise monitoring would be performed in compliance with the Construction Noise Reduction and Mitigation Plan (CNRMP). The addition of overhead work at Location 2.1 and the associated WA 2.1 was not originally anticipated in the IS/MND. However, the nearest sensitive receptor to Location 2.1 is also within 100 feet of the San Marcos Substation, where construction activity has been ongoing with no exceedances over the hourly 75 dBA threshold and no public complaints have been received.
	<input type="checkbox"/> N	<p>In addition, per Table 3.13-2 in the IS/MND, the ambient noise level taken over a 30 minute average on Discovery Street is approximately 63 dBA. The equipment noise hourly average for boom trucks (or bucket trucks) is 60 dBA at 100 feet per Table 3.13-13 in the IS/MND. Taking into consideration that Table 3.13-13 includes a combined noise level for two bucket trucks operating at one time, and the work at Location 2.1 will be completed with a single bucket truck and would only take a day or two to complete, it is not likely that the nearest sensitive receptors will be disturbed by this activity.</p> <p>The utilization of WA 3 would not involve new activities that would cause a substantial increase in construction noise, nor would it expand the work area closer to the nearest sensitive receptors. WA 7 is not located within 100 feet of a sensitive receptor and no new activities would be performed. Therefore, MPR-11 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. All activities performed within the proposed MPR-11 work areas would take place in accordance with the CNRMP.</p>
Agency Consultation?	<input type="checkbox"/> Y	MPR-11 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	<p>MPR-11 would involve the trimming of an ornamental acacia shrub within WA 7, the removal of three African sumac trees and the existing juniper understory within WA 3, and the trimming of two mature olive trees partially within WA 3 (see Attachment C). No vegetation trimming is anticipated within WA 2.1.</p> <p>The modifications to ornamental vegetation within WA 3 at the San Marcos Substation would create a minor visual change to the overall</p>

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
	<input type="checkbox"/> N	<p>landscaping. As stated in Section 3.1 of the IS/MND, much of the existing substation is obscured from view due to the presence of the 8-foot-tall screening wall and landscaping. The removal of landscaping within WA 3 would be temporary as restoration of ornamental vegetation would take place following construction, and the 8-foot screening wall would remain in place. Therefore, the temporary modifications to landscaping proposed in WA 3 would not be expected to result in an impact to the existing visual quality of public views beyond what was analyzed in the IS/MND, Section 3.1.</p> <p>Although the trimming of the ornamental vegetation within WA 7 would temporarily change the landscaping, the change would be limited to a relatively small area (487 square feet) with low visual sensitivity. Post-construction restoration of WA 7 would also be conducted in coordination with the property owner. Therefore, MPR-11 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-11 would not require agency consultation relating to aesthetic and visual resources. However, San Marcos High School was consulted to get approval to trim the ornamental vegetation within WA 7.</p>
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>MPR-11 would involve the trimming of an ornamental acacia shrub (<i>Acacia longifolia</i>) within WA 7, the removal of three African sumac trees (<i>Searsia lancea</i>) and the existing juniper shrub (<i>Juniperus horizontalis</i>) within WA 3, and the trimming of the two mature olive trees (<i>Olea europea</i>) located partially within WA 3. Please see Attachment C, MPR-11 Site Photographs, for photos of the proposed work areas and vegetation. No vegetation trimming is proposed within WA 2.1.</p> <p>Vegetation trimming within WA 7 will be performed with both hand tools and a skid steer with a mower deck and vegetation trimming would be 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. Trimming of the mature olive trees would be limited to the extent practicable to allow for overhead wire and pole installation activities. The non-native juniper shrub and African sumac trees used for landscaping would be removed (grubbed). BMPs would be installed to prevent off-site sedimentation.</p> <p>MPR-11 would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. Pre-construction nesting bird surveys will take place prior to vegetation trimming activities associated with MPR-11 during the nesting season (February 15 – August 15) in accordance with APM BIO-6. Although there is no habitat within the MPR-11 work areas, a biological monitor will monitor vegetation</p>

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		<p>trimming activities within WA 7 and conduct daily spot checks due to the nearby jurisdictional aquatic feature (San Marcos Creek) and riparian habitat. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-11 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-5 • 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-11 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	The MPR-11 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-11. Therefore, MPR-11 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-11 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)

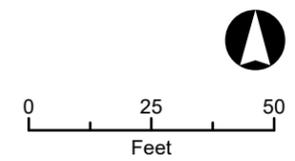
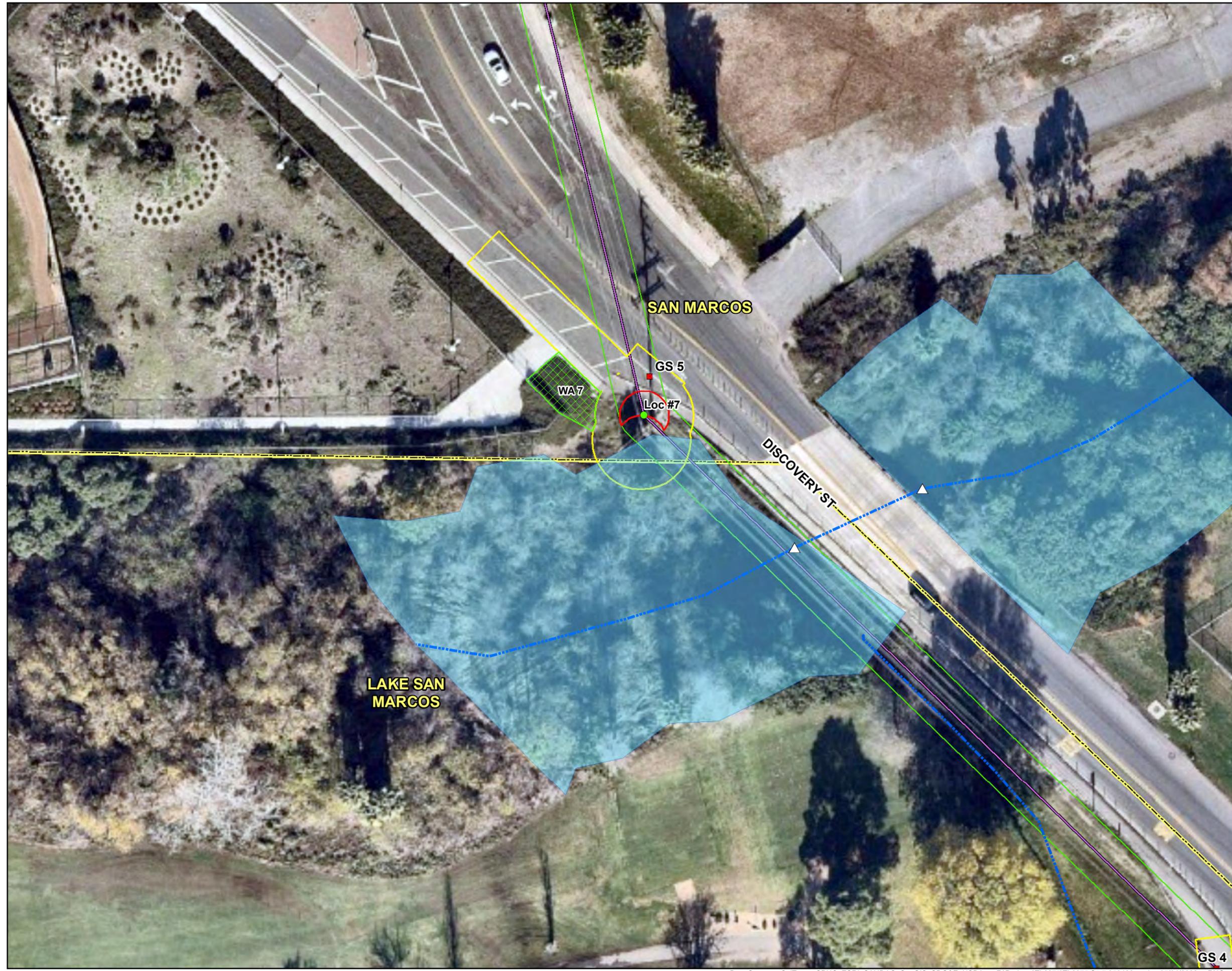
			<input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only			
<input type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied	<input type="checkbox"/> Beyond Authority	
<u>Conditions of Approval or Reason for Denial:</u>			
Prepared by:		Date:	

ATTACHMENT B
MPR-11 Figure

**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR 11
Additional Temporary Work Area
San Diego County, CA

LEGEND

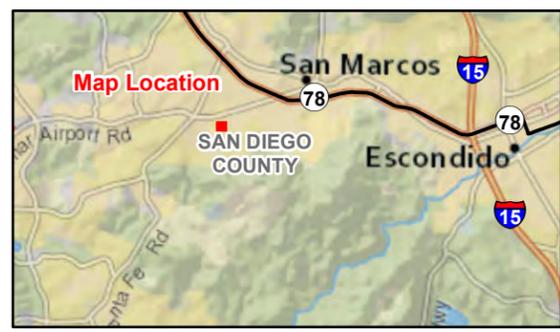
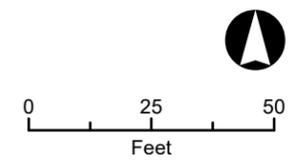
-  State Highway
-  Municipal Boundary
- Proposed Project**
-  Replace Existing with Pier Foundation
-  No Work / Information Only
-  Guard Structures
-  Rack
-  Segment 1 - Rebuild
-  Temporary Work Area
-  Permanent Work Area or Grading Impacts
-  Alignment in Franchise
- MPR-11 Component**
-  Additional Temporary Work Area
- Aquatics Resources**
-  Culvert
-  JD Stream
-  Wetland / Riparian



**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR 11
Additional Temporary Work Area
San Diego County, CA

LEGEND

- State Highway
- ▭ Municipal Boundary
- Proposed Project**
- Replace Existing with Pier Foundation
- Overhead Work
- Guard Structures
- Rack
- Segment 1 - Rebuild
- ▭ Temporary Work Area
- ▭ Permanent Work Area or Grading Impacts
- ▭ Alignment in Franchise
- MPR-11 Component**
- ▭ Additional Temporary Work Area



ATTACHMENT C
MPR-11 Site Photographs

MPR-11 PHOTO LOG

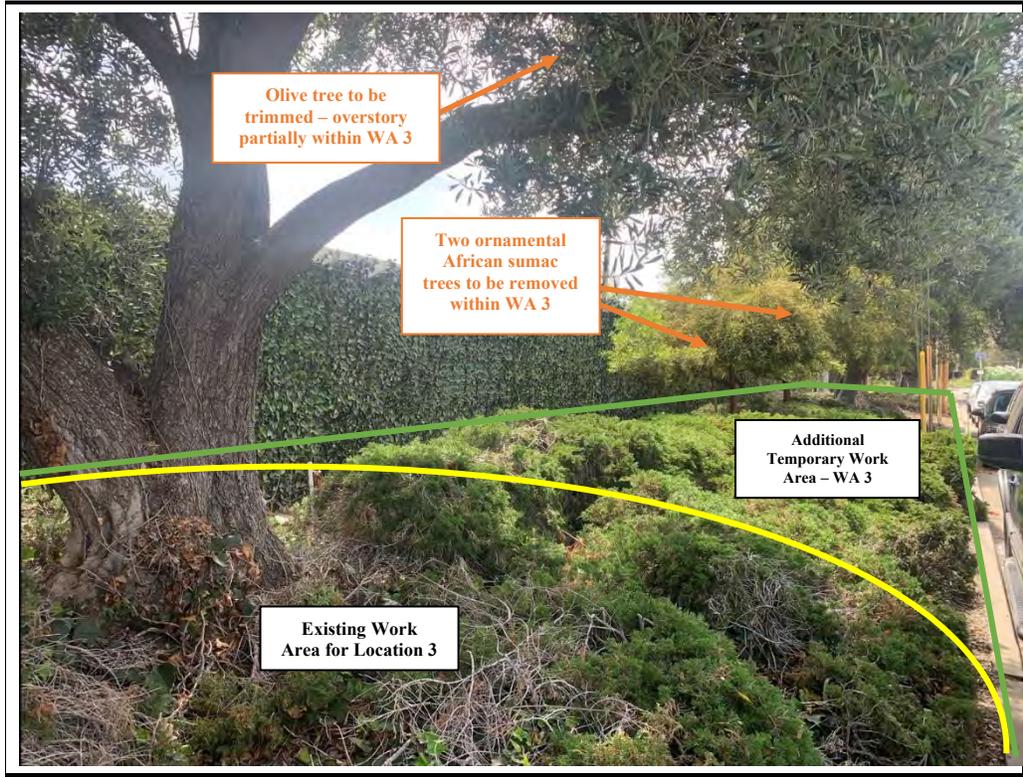


Photograph 1:
View of additional temporary work area for Location 2.1 (WA 2.1). No vegetation trimming is proposed within WA 2.1. Facing: SE.

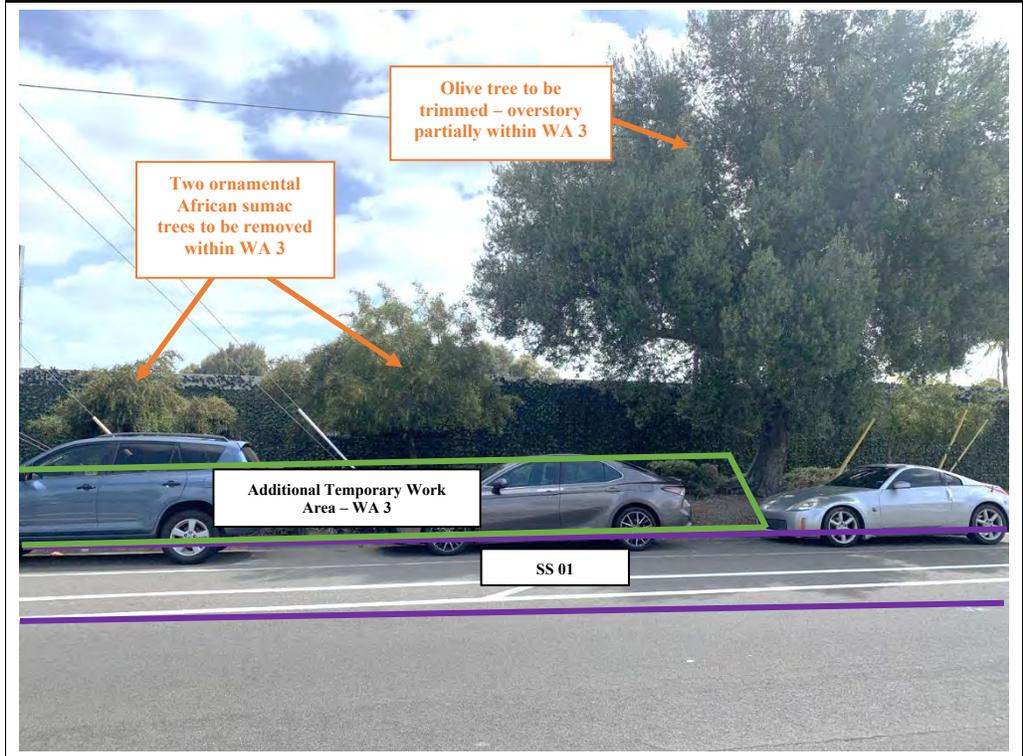


Photograph 2:
View of the additional temporary work area at Location 3 (WA 3) and Stringing Site 01. An overview of vegetation removal at this location is shown on Photographs 3-5. Facing: SE.

MPR-11 PHOTO LOG

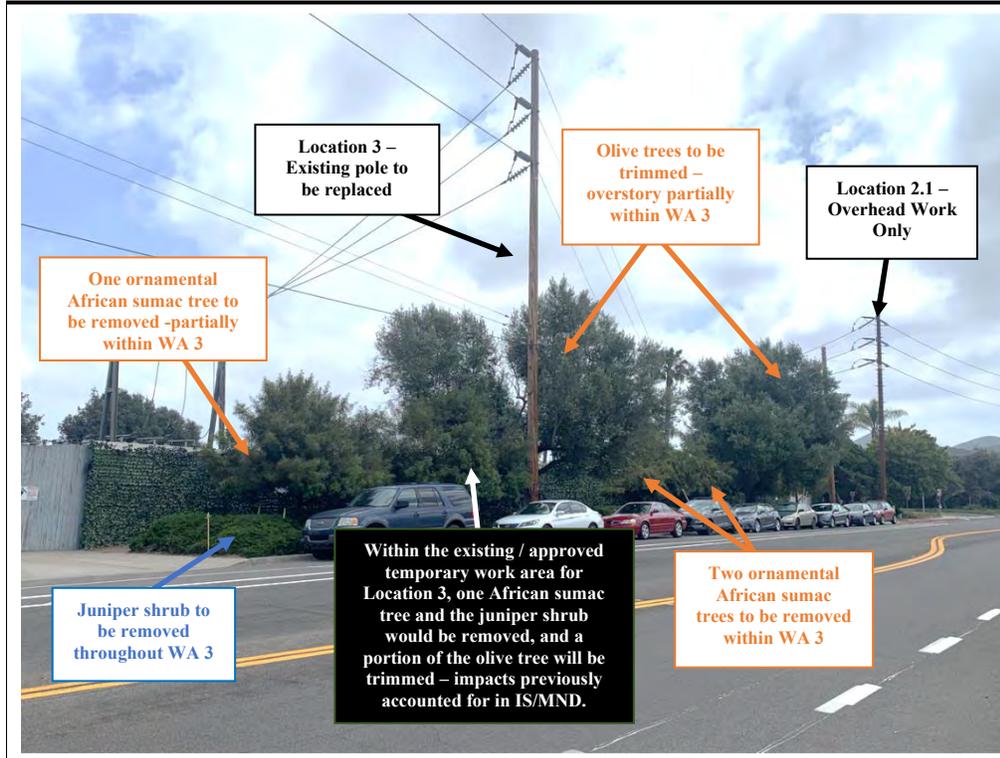


Photograph 3:
View of the existing work area for Location 3, the proposed WA 3 as well as two of the African sumac trees proposed for removal and one of the olive trees proposed for trimming. The juniper shrub understory will also be removed throughout WA 3. Facing: East.



Photograph 4:
View of the proposed WA 3, Stringing Site 01 as well as two of the African sumac trees proposed for removal and one of the olive trees proposed for trimming. The juniper shrub understory will also be removed throughout WA 3. Facing: East.

MPR-11 PHOTO LOG



Photograph 5:
Overview of ornamental vegetation to be trimmed and removed within WA 3. Facing: SE.



Photograph 6:
View of additional temporary work area adjacent to Location 7 (WA 7). The ornamental acacia shrub within WA 7 will be trimmed. Facing: NW.