



William Yee  
TL6975 Environmental Project Manager  
San Diego Gas & Electric Company  
(T) 619-857-8922

May 20, 2022

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

**Re: Minor Project Refinement No. 12 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. 12 (MPR-12) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-12 will authorize a revised work area at Location 56 and an additional work area near Location 8. The requested work areas total 4,620 square feet, or 0.11 acre. Please refer to **Attachment B, MPR-12 Figure** and **Attachment C, MPR-12 Site Photographs** to view the MPR-12 work areas.

- Attachment A: MPR-12 Form
- Attachment B: MPR-12 Figure
- Attachment C: MPR-12 Site Photographs

**Description of MPR-12 Workspace and Activities**

As stated above, SDG&E is requesting approval of a revised work area at Location 56 due to design changes and an additional work area near Location 8 on the TL6975 San Marcos to Escondido Project (Project).

- **Location 8 Additional Work Area (WA 8):** WA 8 is located in the median west of Location 8 at the intersection of San Marcos Boulevard and Discovery Street. Three camphor trees will need to be trimmed within WA 8. WA 8 would be utilized for temporary laydown of tree trimming materials and equipment. No other activities are proposed within WA 8. Please see **Attachment C** for an overview of trees to be trimmed within WA 8.
- **Location 56 Revised Work Area (WA 56)<sup>1</sup>:** WA 56 is the revised work pad east of Location 56 which has been shifted approximately 20 feet west. This work area

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<sup>1</sup> The graded pad area east of Location 56 being proposed for revision in this MPR request was part of the permitted Project in the Final IS/MND, but was inadvertently omitted from the NTP-1 Mapbook.

revision prompted the need for a retaining wall to be built within the permanent pad as shown on **Attachment B**. The retaining wall will be approximately 8 feet high and 60 feet long. There is no other change to the approved scope of work at this location, which will include grading the permanent pad and the installation of a brow ditch.

Any damage to sidewalks or public roadways resulting from MPR-12 activities, including any curb damage, will be immediately repaired following completion of MPR-12 construction activities in accordance with APM PS-4. The temporary disturbance associated with the MPR-12 work areas will be stabilized in accordance with the SWPPP. The revised plans for Location 56 will be included in a forthcoming addendum to the San Marcos Grading Permit No. GP21-00003.

MPR-12 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.

### **Preconstruction Requirements and Permit/Approvals**

The activities described herein will not change the conditions set forth in the CPUC’s NTP-1 approval letter dated September 9, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any MMRCPP pre-construction requirements described in NTP-1. The revised plans for Location 56 will be included in a forthcoming addendum to the San Marcos Grading Permit No. GP21-00003. If needed, a ROW permit with a Traffic Control Plan will be acquired from the City of San Marcos for tree trimming activities within WA 8.

### **MPR-12 Request for Approval**

SDG&E respectfully requests approval of MPR-12 for the approval of a revised work area at Location 56 and an additional work area near Location 8 by May 27, 2022. MPR-12 activities would take place in accordance with conditions outlined in the CPUC’s NTP-1 approval letter, as well as requirements in the IS/MND and MMRCPP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at [wyee@sdge.com](mailto:wyee@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-12 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 20, 2022

**Report No.:** 12

**Date Approved:** TBD

**Approval Agency:** California Public Utilities Commission (CPUC).

**Property Owner(s):**

- The Location 8 Additional Work Area (WA 8) is located within City right-of-way (ROW).
- The Location 56 Revised Work Area (WA 56) is located within SDG&E ROW.

**Location/Milepost:** The MPR-12 work areas are located in the City of San Marcos.

**Land Use/Vegetative Cover:** The land use and vegetative cover for the proposed Minor Project Refinement No. 12 (MPR-12) work areas are estimated as follows:

- WA 8 – 3,500 square feet (0.08 acre) in developed, bare ground and ornamental vegetation.
- WA 56 – 1,120 square feet (0.02 acre) in disturbed.

**Sensitive Resources:** WA 8 is within an existing archaeological site.

**Modification  
From:**

☐ Permit

☐ Plan/Procedure

☐ Specification

☐ Drawing

☐ Mitigation  
Measure

☒ Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-12 for a revised work area at 56 due to design changes and an additional work area near Location 8 for the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-12 Figure** and **Attachment C, MPR-12 Site Photographs**, for an overview of the proposed MPR-12 work areas.

- **Location 8 Additional Work Area (WA 8):** WA 8 is located in the median west of Location 8 at the intersection of San Marcos Boulevard and Discovery Street. Three camphor trees will need to be trimmed within WA 8. WA 8 would be utilized for temporary laydown of tree trimming materials and equipment. No other activities are proposed within WA 8. If needed,

a ROW permit with a Traffic Control Plan will be acquired from the City of San Marcos for this work. Please see **Attachment C** for an overview of trees to be trimmed within WA 8.

- **Location 56 Revised Work Area (WA 56)<sup>1</sup>:** WA 56 is the revised work pad east of Location 56 which has been shifted approximately 20 feet west. This work area revision prompted the need for a retaining wall to be built within the permanent pad as shown on **Attachment B**. The retaining wall will be approximately 8 feet high and 60 feet long. There is no other change to the approved scope of work at this location, which will include grading the permanent pad and the installation of a brow ditch.

Any damage to sidewalks or public roadways resulting from MPR-12 activities, including any curb damage, will be immediately repaired following completion of MPR-12 construction activities in accordance with APM PS-4. The temporary disturbance associated with the MPR-12 work areas will be stabilized in accordance with the SWPPP. The revised plans for Location 56 will be included in a forthcoming addendum to the San Marcos Grading Permit No. GP21-00003.

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

Original Condition: The MPR-12 work areas are located within the geographic study area of the IS/MND and are adjacent to or within 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-12 work areas for the reasons described below.

Justification for Change:

- **WA 8:** Three of the trees within WA 8 will need to be trimmed in order to complete construction activities at Location 8. Since the new pier foundation site nearly overlaps with the existing pole location at Location 8, the existing pole will need to be removed prior to foundation drilling, and a temporary (shoo-fly) pole will be installed within the approved work area south of Location 8. The overhead lines will be transferred to the shoo-fly pole until the new pole is installed, temporarily shifting the overhead alignment slightly south between Locations 8 and 11. The three camphor trees will need to be trimmed within WA 8 to meet overhead clearance standards in General Order (GO) 95, which requires a minimum of 4 feet of clearance between trees and overhead power lines. It should be noted, the City of San Marcos has confirmed with SDG&E that all the trees within WA 8 will be removed in Summer 2022 as part of a City realignment project on Discovery Street.
- **WA 56:** During field review it was determined that the approved work area for the permanent pad at Location 56 was partially within the Carlsbad Municipal Water District's easement and needed to be shifted approximately 20 feet west to avoid the easement. This shift prompted the need for a retaining wall to be installed to stabilize the slope of the pad. The revised work limits of the pad are within the SDG&E ROW. It should be noted, taking into account the existing work areas that will no longer be used by the Project, there will be a net decrease of overall work area (-630 sf, 0.01 acre) resulting from this change as demonstrated in the Disturbance Acreage Changes Section below.

Maps & Figure: Refer to **Attachment B, MPR-12 Figure**, for a map of the proposed MPR-12 work areas. Refer to **Attachment C, MPR-12 Site Photographs**, for pictures of the current conditions of the MPR-12 work areas.

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<sup>1</sup> The graded pad area east of Location 56 being proposed for revision in this MPR request was part of the permitted Project in the Final IS/MND, but was inadvertently omitted from the NTP-1 Mapbook.

Environmental Impact: Utilization of the MPR-12 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-12 work areas. MPR-12 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-12 are estimated in the table below:

MPR-12 Work Area	Disturbed	Bare Ground	Developed / Paved Ground	Ornamental	Total
WA 8	-	875 sf	1,600 sf	1,025 sf	3,500 sf (0.08 acre)
WA 56	1,120 sf	-	-	-	1,120 sf (0.02 acre)
<b>Total:</b>	<b>1,120 sf (0.03 acre)</b>	<b>875 sf (0.02 acre)</b>	<b>1,600 sf (0.04 acre)</b>	<b>1,025 sf (0.02 acre)</b>	<b>4,620 sf (0.11 acre)</b>

WA 8 is located within an existing archaeological site. However, the archaeological deposits are located 50-100 cm below the surface. As there is only tree trimming proposed within WA 8 and no vegetation removal or ground disturbing activities proposed, the archaeological site will not be impacted and cultural monitoring is not required.

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-12 work areas are located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<b><u>Resources:</u></b>			
<b>Biological</b>	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
<b>Previous Biological Survey Report Reference:</b>			
<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-12 work areas on May 13, 2022. There is no habitat located within the MPR-12 work areas. The Project biologist verified that the current conditions are consistent with the results provided in previous biological studies. Consistent with Appendix E of the IS/MND, there is coastal sage scrub (CSS) in the area surrounding WA 56. Due to the proximity of WA 56 to CSS habitat, biological spot checks should take place as needed during MPR-12 activities. Biological monitoring is not anticipated to be required for MPR-12 activities at WA 8. 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 or ground disturbing activities associated with MPR-12 during the nesting season (February 15 – August 15) in accordance with APM BIO-6.</p>			

**Cultural** ☐ No Resources Present ☒ Resources Present ☐ N/A, Change would not affect resources

**Previous Cultural Survey Report Reference:**

Cultural resources within the Project's study area (including the MPR-12 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. WA 8 is located within an existing archaeological site. However, the archaeological deposits are located 50-100 cm below the surface. As there is only tree trimming proposed within WA 8 and no vegetation removal or ground disturbing activities are proposed, the archaeological site will not be impacted and cultural monitoring is not required. WA 56 is not located in a culturally sensitive area and cultural monitoring is not required.

**Disturbance Acreage Changes:** ☒ Yes ☐ No

MPR-12 would result in 3,845 square feet (0.09 acre) of additional temporary disturbance and 775 square feet (0.02 acre) of additional permanent disturbance to the Project as approved.

It should be noted, the shift in the overall work area at Location 56 resulted in a previously approved permanent work area of approximately 850 square feet, and a temporary work area of approximately 900 square feet which will no longer be used by the Project as they are within the Carlsbad Municipal Water District's easement. As there are 775 square feet of additional permanent impacts and 345 square feet of additional temporary impacts proposed within WA 56 as shown in the table below, this results in a net reduction of 75 square feet (< 0.01 acre) of permanent impacts and 555 square feet (0.01 acre) of temporary impacts for WA 56 proposed in MPR-12.

The temporary impacts proposed in WA 8 do not overlap with the original impacts for the approved work area at Location 8.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Loc 8 (Original)	1,621 sf	50 sf	1,671 sf (0.04 acre)
Loc 56 (Original) – including pole site work area	4,733 sf	8,155 sf	12,888 sf (0.08 acre)
<b>Total (Original):</b>	<b>6,354 sf (0.14 acre)</b>	<b>8,205 sf (0.29 acre)</b>	<b>14,559 sf (0.33 acre)</b>
WA 8 (New)	3,500 sf	-	3,500 sf (0.08 acre)
WA 56 (New)	345 sf	775 sf	1,120 sf (0.02 acre)
<b>Total (New):</b>	<b>3,845 sf (0.09 acre)</b>	<b>775 sf (0.02)</b>	<b>4,620 sf (0.11 acre)</b>



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>Although MPR-12 would involve ground disturbance within WA 56, the proposed activities (grading, brow ditch installation, etc.) would still take place in approximately the same area as approved in the IS/MND. The only change is the introduction of a retaining wall, which will help ensure there are no new geologically-related hazards at this location. WA 56 is not located within a paleontologically sensitive area so paleontological monitoring is not anticipated to be required for ground disturbance. It should be noted, the redesign of this pad resulted in less overall ground disturbance than what was analyzed in the IS/MND, Section 3.7.</p> <p>As stated in Section 3.7.1 of the IS/MND, the area in which WA 56 is located is characterized by moderately corrosive soils and a general susceptibility to landslides. A supplemental Geotechnical Report was prepared in compliance with MM GEO-1 which was approved by the CPUC on May 18, 2021. The design recommendations for Location 56 would still apply as the geologic conditions have not changed. Seismic testing was also performed for Location 56. Recommendations from the supplemental Geotechnical Report and the seismic testing were incorporated into the revised designs at Location 56.</p> <p>Grubbing and clearing of vegetation will occur within the permanent impact areas in WA 56. Erosion control BMPs will be incorporated in accordance with the SWPPP and the Erosion Control Plan attached to the San Marcos Grading Permit. The revised design plans for Location 56 will also be approved by the City in a forthcoming addendum to the Grading Permit No. GP21-00003.</p> <p>There are no other changes to the work scope at Location 56 proposed within MPR-12 that would be expected to affect geology, seismicity, or paleontological resources differently than what was proposed in the IS/MND, Section 3.7.</p> <p>There is no vegetation removal or ground disturbance proposed within WA 8. Utilization of the MPR-12 work areas would not be expected to create any new geologically-related hazard beyond what was previously disclosed in the Project's IS/MND, Section 3.7. Following MPR-12 activities, the temporary portions of the work areas will be stabilized in accordance with the SWPPP.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input checked="" type="checkbox"/> Y	An addendum to the approved City of San Marcos Grading Permit No. GP21-00003 will be required prior to the performance of ground disturbing activities within WA 56.
	<input type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	There are no significantly different activities being proposed in MPR-12 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-12 work areas would not require any new potentially hazardous materials to be used and




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	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-12 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>A concrete brow ditch would be installed within the permanent work area at WA 56 to allow for proper drainage and prevent erosion and siltation. The brow ditch would connect to an existing concrete v-ditch. The work pad would be constructed of compacted Class 2 base to allow for permeation into the soil. In addition, the existing concrete drainage that borders WA 56 would be protected by SWPPP BMPs during construction activities.</p> <p>There are no jurisdictional or non-jurisdictional drainages that would be affected by the use of WA 8. MPR-12 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.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input checked="" type="checkbox"/> Y	An addendum to the approved City of San Marcos Grading Permit No. GP21-00003 will be required prior to the installation of the brow ditch at WA 56.
	<input 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 8 is located within an existing archaeological site. However, the archaeological deposits are located 50-100 cm below the surface. As there is only tree trimming proposed within WA 8 and no vegetation removal or ground disturbing activities are proposed, the archaeological site will not be impacted and cultural monitoring is not required. WA 56 is 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.
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-12 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, WA 8 is located within an archaeological site. However, as there is no vegetation removal or ground disturbance proposed within WA 8, Native American monitoring is not required. 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-12 would not require agency or tribal consultation in relation to tribal 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.
Traffic and Circulation	<input checked="" type="checkbox"/> Y	<p>MPR-12 would not result in any change to traffic and circulation impacts at Location 56. If needed, a ROW permit with a Traffic Control Plan would be acquired from the City of San Marcos to perform tree trimming within WA 8. Accordingly, traffic and circulation impacts resulting from MPR-12 are anticipated to be similar to those disclosed in the IS/MND, Section 3.17. In addition, impacts related to traffic control activities on San Marcos Boulevard and Discovery Street were anticipated and analyzed in the IS/MND.</p> <p>In compliance with APM PS-4, SDG&amp;E would repair any damage to public roads, sidewalks or curbs resulting from MPR-12 activities following completion of construction activities. MPR-12 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.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input checked="" type="checkbox"/> Y	All traffic control activities would be performed in compliance with approved traffic control plans issued by the City of San Marcos.
	<input type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	<p>MPR-12 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-12 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-12 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-12 would not affect air quality or emissions in a manner substantially different from the impacts assessed as part of the Project's IS/MND.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-12 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.												
Noise and Vibration	<input checked="" type="checkbox"/> Y	<p>The revised work area at WA 56 does not change the distance of the work area from the nearest sensitive receptor nor would the proposed activities be different enough to create any change from the noise impacts anticipated at Location 56 in the IS/MND, Section 3.13. WA 56 is within 100 feet of a sensitive receptor and noise monitoring would be performed in compliance with the Construction Noise Reduction and Mitigation Plan (CNRMP). The equipment utilized for wall construction within WA 56 (loader, forklift, excavator) would create similar noise levels as equipment utilized for work area preparation and foundation drilling (excavator, drill rig, grader). Please see below for a table summarizing the hourly averages of two pieces of each equipment running simultaneously at a distance of 100 feet per Table 3.13-13 in the IS/MND. As shown below, the wall construction would not be expected to significantly increase noise levels at this location beyond what was anticipated for pad preparation.</p> <table><tr><th>Equipment</th><th>Hourly Average dBA at 100 feet per Table 3.13-13 in IS/MND</th></tr><tr><td>Loader</td><td>67 dBA</td></tr><tr><td>Forklift</td><td>74 dBA</td></tr><tr><td>Excavator</td><td>69 dBA</td></tr><tr><td>Drill Rig</td><td>64 dBA</td></tr><tr><td>Grader</td><td>73 dBA</td></tr></table>	Equipment	Hourly Average dBA at 100 feet per Table 3.13-13 in IS/MND	Loader	67 dBA	Forklift	74 dBA	Excavator	69 dBA	Drill Rig	64 dBA	Grader	73 dBA
	Equipment	Hourly Average dBA at 100 feet per Table 3.13-13 in IS/MND												
	Loader	67 dBA												
Forklift	74 dBA													
Excavator	69 dBA													
Drill Rig	64 dBA													
Grader	73 dBA													
<input type="checkbox"/> N	<p>WA 8 is not located within 100 feet of a sensitive receptor and tree trimming activities would not be anticipated to create any new impacts related to noise and vibration. Therefore, MPR-12 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-12 work areas would take place in accordance with the CNRMP.</p>													
Agency Consultation?	<input type="checkbox"/> Y	MPR-12 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-12 would involve the trimming of three ornamental camphor trees within WA 8 (see <b>Attachment C</b>). WA 8 is partially within Key Observation Point (KOP) A in the IS/MND Section 3.1. The developed visual character of KOP A is softened by the ornamental vegetation in WA 8 and the surrounding area. Tree trimming will be limited to the extent practicable and no other ornamental vegetation or trimming is proposed within WA 8. As described in Section 3.1.1 of the IS/MND, KOP A has a low to moderate visual sensitivity which would not be impacted by this minor change. It should also be noted, the City of San Marcos has confirmed with SDG&amp;E that all the trees within WA 8 will be removed in Summer 2022 as part of a City realignment project on Discovery Street.</p>												
	<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>WA 56 can be partially viewed within KOP D. As described in Section 3.1.1 on the IS/MND, the prominent features within KOP D are the water tank and transmission poles. Although the coastal sage scrub habitat and ornamental vegetation are noticeable in the view, the transmission poles and overhead line dominate the view and make the visual sensitivity moderate. As there is no change to the overhead components at Location 56 or significant changes to the work area at WA 56, MPR-12 activities are not anticipated to affect the visual quality of public views represented by KOP D.</p> <p>Therefore, MPR-12 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	MPR-12 would not require agency consultation relating to aesthetic and visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>MPR-12 would involve the trimming of three ornamental camphor trees (<i>Cinnamomum camphora</i>) within WA 8. Please see <b>Attachment C, MPR-12 Site Photographs</b>, for a photo of the trees to be trimmed. Trimming of the camphor trees within WA 8 would be limited to the extent practicable to allow for overhead wire clearance per GO 95.</p> <p>Vegetation trimming within the temporary portion of WA 56 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&amp;E NCCP Operational Protocol No. 36 (Section 7.1) to maintain the root structure and seed bank. BMPs would be installed at WA 56 following vegetation removal to prevent off-site sedimentation.</p> <p>There are no impacts to habitat proposed in MPR-12, therefore this MPR request 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 and removal activities associated with MPR-12 during the nesting season (February 15 – August 15) in accordance with APM BIO-6.</p> <p>A biological monitor will spot check MPR-12 activities within WA 56 as needed due to its proximity to CSS habitat. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-12 activities, as well as the requirements in the NCCP:</p> <ul style="list-style-type: none"> <li>• APM BIO-1</li> <li>• APM BIO-2</li> <li>• APM BIO-3</li> </ul>

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"> <li>• APM BIO-4</li> <li>• APM BIO-5</li> <li>• APM BIO-6</li> <li>• APM BIO-7</li> <li>• APM BIO-8</li> <li>• APM BIO-9</li> <li>• MM BIO-1: Project Compliance with the Federal and California Endangered Species Acts.</li> <li>• MM BIO-2: Establishment of Cylindrical Construction Buffers</li> </ul>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-12 would not require agency consultation relating to vegetation and wildlife.
Wildfire	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The MPR-12 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-12. Therefore, MPR-12 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.
Agency Consultation	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-12 would not require agency consultation relating to wildfire.

Approvals	Date	Name (print)	Signature			
San Diego Gas and Electric Project Manager	5/26/2022	Melinda Kimble		<input checked="" type="checkbox"/> Reviewed		
San Diego Gas and Electric Environmental Project Manager	5/26/2022	William Yee		<input checked="" type="checkbox"/> Reviewed		
CPUC Project Manager	5/25/2022	Trevor Pratt		<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied		
<b>For CPUC Compliance Manager Use Only</b>						
<input checked="" type="checkbox"/> Refinement Approved		<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority		
<b>Conditions of Approval or Reason for Denial:</b>						
<div>Prepared by:</div> <div>Date:</div>						

**ATTACHMENT B**  
**MPR-12 Figure**

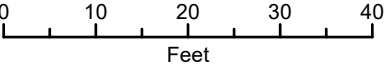




**TL6975 SAN MARCOS  
to ESCONDIDO PROJECT**  
**MPR 12**  
**Additional Work Areas**  
**San Diego County, CA**

**LEGEND**

- Existing Structure
- Existing 138kV Transmission Line
- State Highway
- Municipal Boundary
- Proposed Project**
  - New Pier Foundation
  - Segment 2 - New Build
  - Existing Access Road
  - Temporary Work Area
  - Permanent Work Area or Grading Impacts
  - Existing ROW
- MPR-12 Component**
  - Revised Temporary Work Area Boundary
  - Revised Permanent Work Area Boundary
  - Previously Permitted Temporary Work Area
  - Previously Permitted Permanent Work Area
  - New Temporary Work Area
  - New Permanent Work Area
  - Removed Temporary Work Area Removed
  - Permanent Work Area
  - New Retaining Wall
  - New Retaining Wall





# TL6975 SAN MARCOS to ESCONDIDO PROJECT

MPR 12  
Additional Work Areas  
San Diego County, CA

## LEGEND

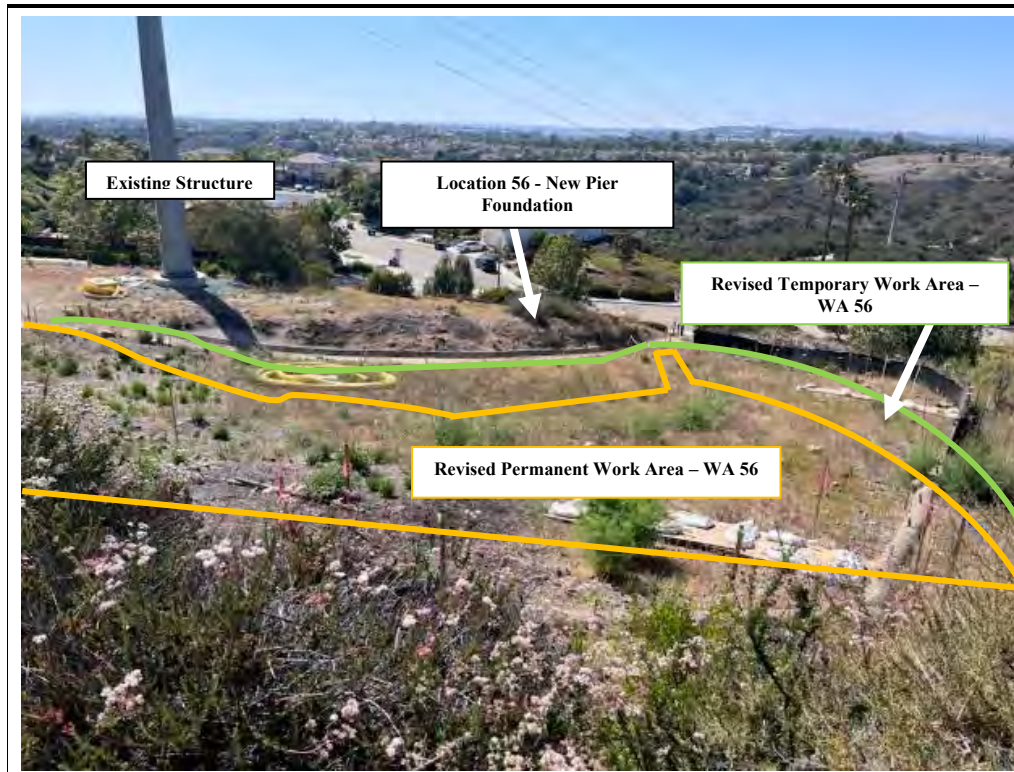
- State Highway
- Municipal Boundary
- Proposed Project**
  - Replace Existing with Pier Foundation
  - Replace Existing with Direct Bury
  - Guard Structures
  - Segment 1 - Rebuild
  - Stringing Site
  - Temporary Work Area
  - Permanent Work Area or Grading Impacts
  - Alignment in Franchise
  - Approximate Additional ROW Required
  - Existing ROW
- MPR-12 Component**
  - Additional Temporary Work Area





**ATTACHMENT C**  
**MPR-12 Site Photographs**

MPR-12 PHOTO LOG



**Photograph 1:**

View of revised temporary and permanent work areas for the pad at Location 56 (WA 56).

Facing: Southwest



**Photograph 2:**

View of WA 56 where the green polygon represents the revised temporary work limits and the orange polygon represents the revised permanent work limits.

Facing: Southeast

MPR-12 PHOTO LOG



**Photograph 3:**

View of additional temporary work area west of Location 8 (WA 8) and camphor trees to be trimmed. Facing: Northwest



**Photograph 4:**

View of WA 8 and the three camphor trees to be trimmed. No other vegetation is proposed to be trimmed. Facing: Northwest



**MPR-12 PHOTO LOG**



**Photograph 5:**

View of WA 8.  
The ornamental  
Indian Hawthorne  
trees and other  
ornamental  
vegetation in this  
photo will not be  
trimmed.

Facing: Northwest