



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

September 8, 2022

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

Re: Minor Project Refinement No. 15 for the TL 6975 San Marcos to Escondido Project

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is submitting a Minor Project Refinement No. 15 (MPR-15) at the request of the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). MPR-15 requests the use of a new temporary construction access road to Location 36 instead of the approved permanent access road included in the IS/MND, PTC, and NTP-1. Please refer to **Attachment A, MPR-15 Form, Attachment B, MPR-15 Figure** and **Attachment C, MPR-15 Site Photographs** to view the MPR-15 elements and work areas.

MPR-15 Request for Approval

SDG&E respectfully requests the approval of MPR-15 for the use of the new temporary construction access road by Friday, September 9, 2022. MPR-15 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 wyee@sdge.com.

Sincerely,

William R. Yee

William Yee
TL6975 Environmental Project Manager

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

ATTACHMENT A
MPR-15 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: September 8, 2022

Report No.: 15

Date Approved: September 8, 2022

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The MPR-15 temporary access road is located on property owned by the City of San Marcos.

Location/Milepost: The MPR-15 temporary access road is located in the City of San Marcos, adjacent to Location 36.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed Minor Project Refinement No. 15 (MPR-15) work areas are estimated as follows:

Sensitive Resources: The MPR-15 area is considered sensitive for paleontological resources and contains CSS.

- Approximately 448 square feet (0.01 acre) in coastal sage scrub (CSS), bare ground and ornamental vegetation.

Modification From:

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

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-15 for the use of a temporary construction access road to be located between San Marcos Boulevard and Location 36 for the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-15 Figure** and **Attachment C, MPR-15 Site Photographs**, for an overview of the proposed MPR-15 temporary construction access road. It is important to note that use of the MPR-15 access road would eliminate the need for, and use of, the approved permanent access road to Location 36 that was included in the IS/MND, PTC, and NTP-1.

Preparation of the approximately 32-foot by 14-foot (448 square feet) temporary MPR-15 access road would include the following steps:

- Trim the branches of existing pepper trees located on either side of the new temporary access road.

- Trim existing vegetation within the access road alignment to approximately 4 inches per SDG&E NCCP Operational Protocol No. 36 (Section 7.1).
- Place steel plates to protect the sidewalk and existing landscape irrigation along San Marcos Boulevard.

A Right-of-Way and Traffic Control permit was acquired from the City of San Marcos on July 14, 2022. This permit authorizes the Project to implement traffic control along San Marcos Boulevard, including at Location 36. The City of San Marcos provided approval to the Project to work during daytime hours (7:00 AM – 6:00 PM Monday-Friday, 8:00 AM – 5:00 PM Saturdays), from Locations 36-49 under permit No. ROW22-00131.

Please see **Attachment C (MPR-15 Photographs)** to see photographs of the existing conditions of the proposed and originally approved access roads. The temporary disturbance associated with the MPR-15 temporary access road will be stabilized in accordance with the Project SWPPP or otherwise restored in coordination with the property owner pursuant to the requirements of the SDG&E Subregional NCCP.

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

Original Condition: The MPR-15 temporary construction access road is located within the geographic study area of the IS/MND and is adjacent to the approved Location 36 work area; therefore, the MPR-15 area has been previously analyzed. The conditions of the work area has not changed since the Project was originally designed; however, field constructability revealed the proposed MPR-15 temporary construction access road was better suited than utilizing the approved permanent access road to Location 36 for the reasons described below.

Justification for Change: During negotiations with the City of San Marcos and other landowners adjacent to Location 36 to expand the SDG&E ROW, SDG&E was informed that the approved access road to Location 36 (refer to **Attachment B, MPR-15 Figure**) could not be permanently maintained. SDG&E reviewed the option of constructing a temporary construction access road within the footprint of the approved permanent access road as well as other potential temporary access points, including the proposed MPR-15 temporary access road. SDG&E found that utilization of a more direct access point to Location 36 would require less construction and ground disturbance. SDG&E ultimately selected the MPR-15 road alignment because it was both the shortest distance from San Marcos Boulevard to the structure location and contained the most uniform topography, both of which also limit the amount of construction-related ground disturbance and site preparation.

Maps & Figure: Refer to **Attachment B, MPR-15 Figure**, for a map of the proposed MPR-15 access road. Refer to **Attachment C, MPR-15 Site Photographs**, for pictures of the current conditions of the MPR-15 access road as well as the originally approved permanent access road.

Environmental Impact: Utilization of the MPR-15 temporary construction access road instead of the approved permanent access road would reduce overall impacts for three important reasons:

- The MPR-15 access road is significantly shorter than the approved access road alignment, reducing the area of impact by approximately half;
- The MPR-15 access road would be temporary, whereas the approved access road to Location 36 would be permanent; and
- The topography of the MPR-15 access road alignment is relatively flat, requiring no grading (cut/fill) or other civil preparation work.

Comparatively, the approved access road has significant topographic relief and would require import of soil to create a safe access path to the structure location. As Location 36 is within a paleontologically sensitive area, the avoidance of grading and ground disturbance associated with constructing the originally approved permanent access will reduce the potential for paleontological impacts within the area. The proposed MPR-15 temporary access would also reduce impacts to habitat since construction of the approved access would have created a greater impact to CSS habitat as demonstrated below.

Accordingly, utilization of the MPR-15 temporary construction access road 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 or other agency. As stated, MPR-15 is anticipated to result in a net decrease in impacts and a change from permanent to temporary impacts to habitat; therefore, mitigation drawdown would not be required from the available mitigation credits. However, there would be a deduction of 260 sf from the Low-Effect Habitat Conservation Plan (LE-HCP) "habitat impact limit."

Impacts to land cover resulting from MPR-15 are estimated in the table below:

| Location | Coastal Sage Scrub | Bare Ground | Ornamental | Total |
|--------------------------------------|------------------------|-----------------------|------------------------|-------------------------|
| Approved Permanent Access (Original) | 816 sf (0.02 acre) | 82 sf (<0.01 acre) | 122 sf (<0.01 acre) | 1,020 sf (0.02 acre) |
| MPR-15 Temporary Access (New) | 260 sf (<0.01 acre) | 88 sf (<0.01 acre) | 100 sf (<0.01 acre) | 448 sf (0.01 acre) |

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-15 temporary access road is 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-15 access road alignment on September 8, 2022. The MPR-15 temporary access road contains CSS habitat, bare ground and ornamental vegetation (refer to Attachment C, Photographs 3 and 4). Per APM BIO-8, a biological monitor would be present for the vegetation trimming within the proposed MPR-15 temporary access. Pre-construction nesting bird surveys (APM BIO-6) are not anticipated to be required as use of the MPR-15 temporary access for Location 36 construction is scheduled to take place outside of the nesting season (February 15 – August 31).</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-15 temporary construction access road area) were studied, reviewed, and documented as part of the Project’s PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project’s IS/MND, Section 3.5). Pedestrian surveys were completed for the Project’s study area in February 2015 for the PEA and follow-up pedestrian surveys were performed in 2018. There are no known cultural resources or archaeological sites within the MPR-15 area; therefore, cultural monitoring is not anticipated to be required.

Disturbance Acreage Changes: Yes No

MPR-15 would result in a net reduction in impact area, including a reduction in permanent impacts. The MPR-15 temporary access road would replace the approved permanent access road (refer to **Attachment B, MPR-15 Figure**). The proposed MPR-15 access road would be approximately 32 feet in length (from San Marcos Boulevard to the boundary of the approved Location 36 work area) and 14 feet wide (448 square feet). Whereas the approved access road is approximately 85 feet long and 12 feet wide (1,020 square feet).

Disturbance acreage changes are summarized as follows:

| Location | Temporary Impact | Permanent Impact | Total |
|--|------------------|------------------|----------------------|
| Original permanent access to Location 36 (no longer planned for use) | - | 1,020 sf | 1,020 sf (0.02 acre) |
| MPR-15 new temporary access to Location 36 | 488 sf | - | 488 sf (0.01 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>Although MPR-15 would involve ground disturbance to create and utilize the temporary construction access road, proposed ground disturbance would be limited to trimming and clearing of vegetation and operation of construction equipment on the existing ground surface. No additional excavation, grading, or other sub-surface ground disturbance would occur.</p> <p>The MPR-15 access road is located within a paleontologically sensitive area. Per the Paleontological Resources Monitoring and Mitigation Plan (PRMMP), monitoring shall occur for excavations at all depths at the Location 36 work site. Therefore, a paleontological monitor would be present during construction at Location 36. However, because MPR-15 will only include surface disturbance, additional paleontological monitoring is not required. The utilization of the MPR-15 temporary access as an alternative to the approved</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>permanent access to Location 36 would greatly reduce the potential for impacts to paleontological resources at this location.</p> <p>There are no other aspects of MPR-15 that would be expected to affect geology, seismicity, or paleontological resources differently than what was proposed in the IS/MND, Section 3.7. Therefore, utilization of the MPR-15 access road 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-15 activities, the temporary access road will be stabilized in accordance with the SWPPP.</p> |
| Agency Consultation? | <input type="checkbox"/> Y | MPR-15 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 significantly different activities being proposed in MPR-15 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-15 temporary construction access road would not require any new potentially hazardous materials to be used and would not create any new hazardous waste that could expose the public to hazards not previously disclosed in the Project's IS/MND. All activities will be performed in accordance with the Project's Health and Safety Plan (APM HAZ-1) as well as the Soil and Dewatering Management Plan (MM HAZ-1). |
| | <input checked="" type="checkbox"/> N | |
| Agency Consultation? | <input type="checkbox"/> Y | MPR-15 would not require agency consultation relating to hazards or hazardous materials. |
| | <input checked="" type="checkbox"/> N | |
| Hydrology / Water Quality | <input type="checkbox"/> Y | <p>There is an existing jurisdictional drainage approximately 300 feet south of Location 36 that will not be affected by MPR-15 activities. Erosion control BMPs would be implemented during construction in accordance with the SWPPP.</p> <p>MPR-15 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 checked="" type="checkbox"/> N | |
| Agency Consultation? | <input type="checkbox"/> Y | MPR-15 would not require agency consultation relating to hydrology or water quality. |
| | <input checked="" type="checkbox"/> N | |
| Cultural Resources | <input type="checkbox"/> Y | Review of the Project's previous cultural resources survey reports prepared for the PEA determined there are no known cultural resources or archaeological sites within the MPR-15 access road alignment. Therefore, cultural monitoring is not anticipated to be required and Project impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5. |
| | <input checked="" type="checkbox"/> N | |
| Agency Consultation? | <input type="checkbox"/> Y | MPR-15 would not require agency or tribal consultation in relation to cultural resources. |
| | <input checked="" type="checkbox"/> N | |
| | <input type="checkbox"/> Y | |

| 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"/> N | As stated in the previous section, the MPR-15 temporary access road and Location 36 are not located within a known archaeological site, nor are there any known cultural resources within the work areas. Therefore, Native American monitoring is not required. Impacts would be similar to those disclosed within the Project's IS/MND, Section 3.18. |
| Agency Consultation? | <input type="checkbox"/> Y | MPR-15 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>Traffic control will be required during MPR-15 activities, and a traffic control permit was received from the City of San Marcos (Permit No. ROW22-00131). Traffic control activities were always anticipated to be required for the pole installation at Locations 36, and impacts related to traffic control on San Marcos Boulevard were analyzed in the IS/MND. Pedestrians, bikes and non-motorized transit would be escorted safely around the work areas by the traffic control crew during construction, as needed. Accordingly, traffic and circulation impacts resulting from MPR-15 are anticipated to be similar to those disclosed in the IS/MND, Section 3.17.</p> <p>In compliance with APM PS-4, SDG&E would repair any damage to public roads, sidewalks or curbs resulting from MPR-15 activities following completion of construction activities. MPR-15 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-15 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-15 request. Conversely, the amount of construction activities and operation of construction equipment would be reduced by the utilization of the MPR-15. Impacts associated with fugitive dust could occur in a similar manner as those associated with the approved Project. In relation to potential adverse effects from fugitive dust, the same fugitive dust mitigation that is described in the Project's IS/MND, would take place during MPR-15 activities.</p> <p>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-15 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 | |

| 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-15 would not require agency consultation relating to air quality. |
| | <input checked="" type="checkbox"/> N | |
| Noise and Vibration | <input type="checkbox"/> Y | The MPR-15 access road is not located within 100 feet of sensitive receptors. Noise monitoring would not be required and no impacts are anticipated to occur. As the MPR-15 access road is located directly adjacent to the previously approved Location 36 work areas, the proposed activities would not be expected to create any significant change from the 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-15 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-15 would not require agency consultation relating to noise and vibration. |
| | <input checked="" type="checkbox"/> N | |
| Aesthetics/ Visual Resources | <input type="checkbox"/> Y | MPR-15 would not change the visual character of the surrounding area compared to the approved Project. The MPR-15 access would be temporary, and would not affect the long-term visual character of the surrounding areas. The MPR-15 temporary access is also not located within a key observation point (KOP), scenic vista or other scenic resource identified in the IS/MND. Therefore, MPR-15 would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's IS/MND. |
| | <input checked="" type="checkbox"/> N | |
| Agency Consultation? | <input type="checkbox"/> Y | MPR-15 would not require agency consultation relating to aesthetics and visual resources. |
| | <input checked="" type="checkbox"/> N | |
| Vegetation and Wildlife | <input checked="" type="checkbox"/> Y | <p>MPR-15 would involve disturbance of CSS habitat as well as ornamental vegetation. Two Peruvian pepper trees would be trimmed to allow access for equipment, and the vegetation within the MPR-15 temporary access would be trimmed to 4 inches per the SDG&E NCCP Operational Protocol No. 36.</p> <p>The approved permanent access road to Location 36 would result in over three times the amount of impacts to CSS habitat as the proposed MPR-15 temporary access road. Therefore, utilizing the MPR-15 temporary access as an alternative reduces the overall impacts to habitat in the area of Location 36. As such, MPR-15 would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources.</p> <p>Per APM BIO-8, a biological monitor would be present for the vegetation trimming within the MPR-15 temporary access road. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-15 activities as needed, as well as the requirements in the NCCP:</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. |
|----------------------|---|---|
| | | <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 <input checked="" type="checkbox"/> N | MPR-15 would not require agency consultation relating to vegetation and wildlife. |
| Wildfire | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | The MPR-15 temporary access road associated with Location 36 is 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-15. Therefore, MPR-15 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-15 would not require agency consultation relating to wildfire. |

| Approvals | Date | Name (print) | Signature | |
|--|----------|--|--|--|
| San Diego Gas and Electric Project Manager | 9/8/2022 | Melinda Kimble |  | <input checked="" type="checkbox"/> Reviewed |
| San Diego Gas and Electric Environmental Project Manager | 9/8/2022 | William Yee |  | <input checked="" type="checkbox"/> Reviewed |
| CPUC Project Manager | 9/8/2022 | Trevor Pratt |  | <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied |
| For CPUC Compliance Manager Use Only | | | | |
| <input checked="" type="checkbox"/> Refinement Approved | | <input type="checkbox"/> Refinement Denied | | <input type="checkbox"/> Beyond Authority |

Conditions of Approval or Reason for Denial:

Prepared by:

Date:

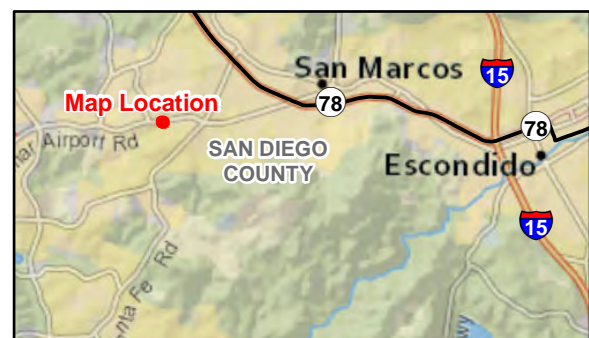
ATTACHMENT B
MPR-15 Figure

**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**

**MPR-15
Loc #36
San Diego County, CA**

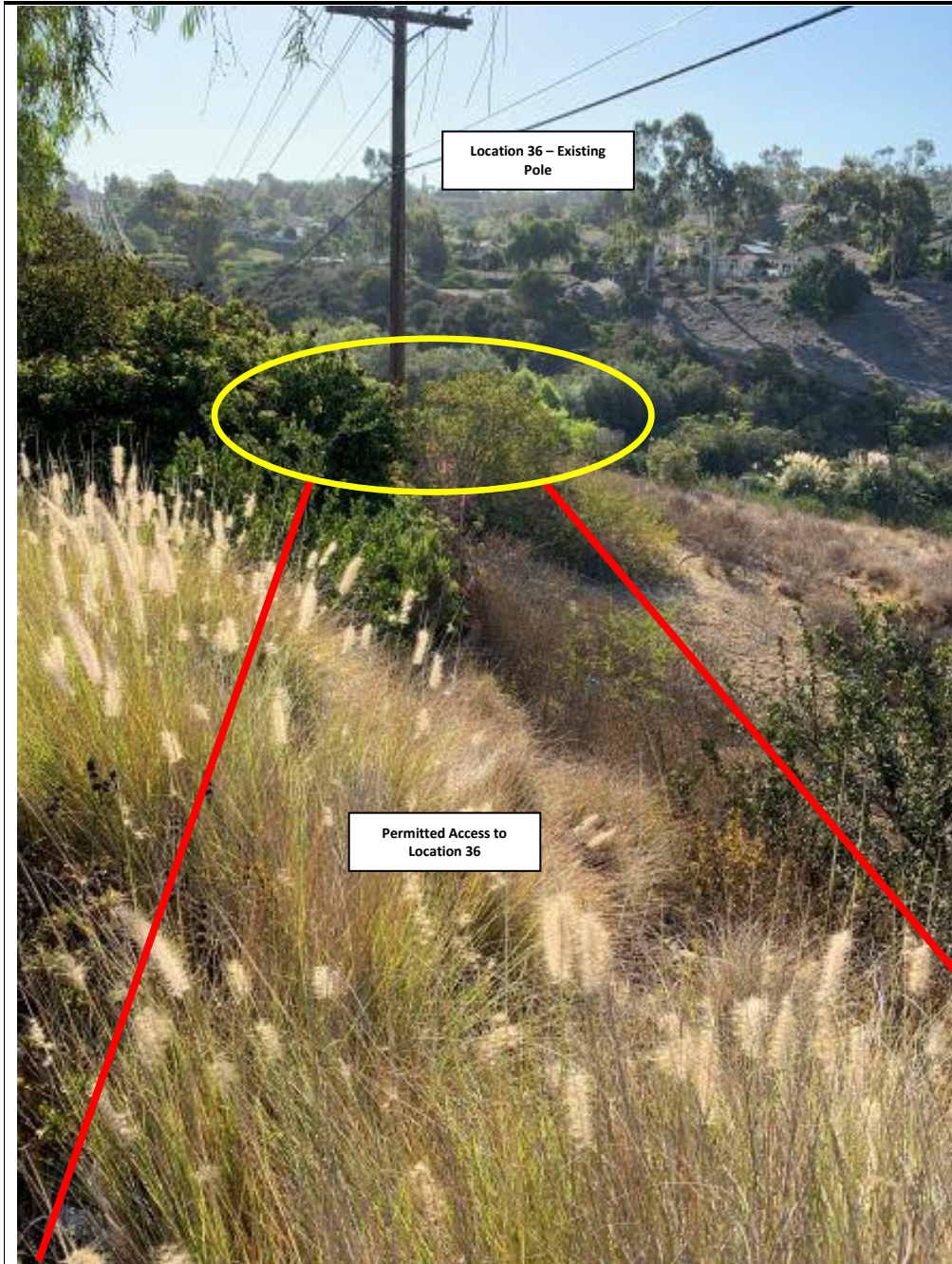
LEGEND

- State Highway
- Proposed Project**
- Direct Bury
- Segment 1 - Rebuild
- ⋯ New Permanent Access Road
- Temporary Work Area
- Permanent Work Area or Grading Impacts
- Existing ROW
- ▨ Approximate Additional ROW Required
- MPR Component**
- ▨ New Access Road
- ▨ Additional Temporary Work Area



ATTACHMENT C
MPR-15 Site Photographs

TL 6975 San Marcos to Escondido Project
Location 36 Access



Photograph 1:
View of the existing pole at Location 36 and the approved permanent access road. Facing: Southeast

Location 36 – Existing Pole

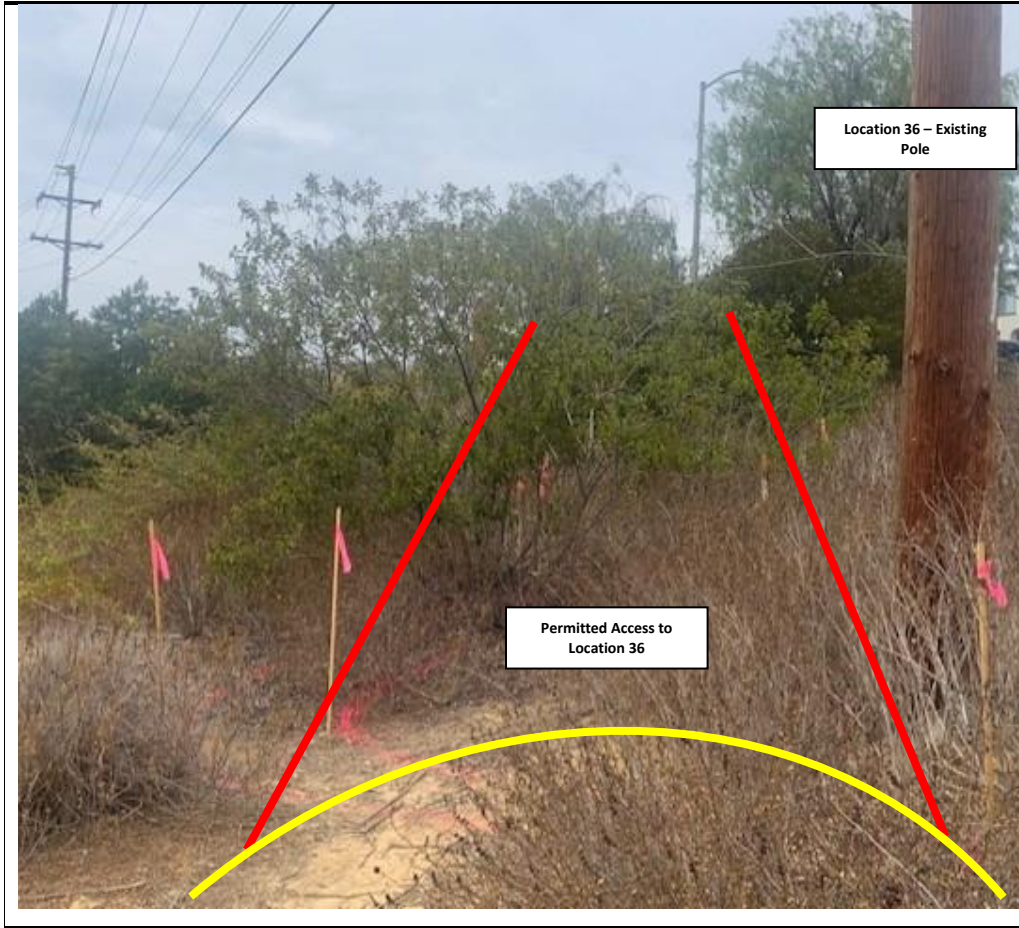
Permitted Access to Location 36

TL 6975 San Marcos to Escondido Project
Location 36 Access



Photograph 2:
View of the existing pole at Location 36 and the approved permanent access road. Facing: Southeast

TL 6975 San Marcos to Escondido Project
Location 36 Access



Photograph 3:
View of the existing pole at Location 36 and the approved permanent access road facing toward San Marcos Boulevard. Facing: northwest

TL 6975 San Marcos to Escondido Project
Location 36 Access



Photograph 4:
View of the existing pole at Location 36 and the proposed temporary access road route. Facing: South

TL 6975 San Marcos to Escondido Project
Location 36 Access



Photograph 5:
View of the existing pole at Location 36 and the proposed temporary access road route. Facing: Southwest