



William Yee
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September 16, 2022

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

Re: Minor Project Refinement No. 16 for the TL 6975 San Marcos to Escondido Project

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is submitting a Minor Project Refinement No. 16 (MPR-16) at the request of the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). SDG&E is requesting approval of MPR-16 to place two concrete anchor blocks per site at Locations 20 or 21 to support wire stringing activities in Segment 1 of the TL6975 San Marcos to Escondido Project (Project). Please refer to **Attachment A, MPR-16 Form, Attachment B, MPR-16 Figure** and **Attachment C, MPR-16 Site Photographs** to view the MPR-16 elements and work areas.

MPR-16 Request for Approval

SDG&E respectfully requests the approval of MPR-16 for the use of the new temporary work areas by Friday, September 23, 2022. MPR-16 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.

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-16 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 16, 2022

Report No.: 16

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s):

- The MPR-16 Additional Work Areas are located partially within SDG&E right-of-way (ROW) and partially on private property.

Location/Milepost: The MPR-16 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. 16 (MPR-16) work areas are estimated as follows:

- WA 20 – 200 square feet (<0.01 acre) in bare ground
- WA 21 – 200 square feet (<0.01 acre) in developed

Sensitive Resources: There are no sensitive resources within the MPR-16 work areas.

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-16 to place two concrete anchor blocks per site at Locations 20 and 21 to support wire stringing activities in Segment 1 of the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-16 Figure** and **Attachment C, MPR-16 Site Photographs**, for an overview of the proposed MPR-16 work areas.

SDG&E has identified two 10-foot by 10-foot work areas at Locations 20 and 21 where two 8-foot by 8-foot concrete anchor blocks would be placed per site adjacent to the approved work areas (see **Attachments B and C**). The concrete blocks have places to attach guy wire, which is then attached to the pole top (i.e., Location 20 and 21). This is necessary to stabilize the pole during wire stringing activities. With the scheduled outage being September 28, either Location 20 or Location 21 will be the end pole on a wire pull beginning at Location 8. Location 21 is preferred, but it is dependent on whether the foundation passes the strength test. If the foundation at Location 21 does not pass

inspection in time, then Location 20 will be used instead. It is for this reason and in the interest of time that both sites are being proposed in this MPR request. SDG&E will not know which location will be used until closer to the date of the outage and wire pull activity. A 10-foot by 10-foot work area has been selected for the 8-foot by 8-foot concrete anchor blocks to allow for any slight adjustments in order to achieve the required tension and angle, however the disturbance area/size will not change.

There is no vegetation trimming or removal proposed in MPR-16. Any damage to sidewalks or public facilities resulting from MPR-16 activities, including in any curb damage, will be immediately repaired following completion of MPR-16 construction activities in accordance with APM PS-4.

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

Original Condition: The MPR-16 work areas were not included in the approved Project. However, the MPR-16 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-16 work areas for the reasons described below.

Justification for Change: Following constructability review at Location 22, it was determined that numerous conflicts existed between the approved Project and existing underground utilities. Some of the conflicts are requiring substantial time to resolve, which will delay construction at Location 22 as well as the stringing of new conductor between Locations 8 and 22. SDG&E would like to utilize an upcoming outage scheduled for September 28, 2022, to pull wire along the segment between Location 8 and Location 22. Because the conflicts at location 22 will not be resolved in time for the September 28 outage, the stringing will need to end at a different location (i.e., Location 20 or 21 – see description above). Regardless of whether the stringing ends at location 20 or 21, MPR-16 is required to complete the stringing. This is because both Locations 20 and 21 are tangent structures whereas Location 22 is proposed to be a deadend structure. Wire pulls are typically completed between two deadend structures.

The MPR-16 anchor blocks will be used to add support (through guy wires) to the tangent structure to allow for the stringing activities. Based on field review of Locations 20 and 21, it was determined that the anchor blocks would need to be placed outside of the approved work areas in the locations shown in **Attachment B, MPR-16 Figure**. Therefore, MPR-16 is required for utilization of the new anchor block work areas. Stringing conductor through this segment during the September 28 outage is critical because it represents the final construction activity required adjacent to San Marcos High School (Locations 12 – 20). Once this segment is strung, disruption of school activities will be minimal. The anchor blocks are tentatively scheduled to be placed on Monday, September 26 ahead of the stringing activities on September 28.

Maps & Figure: Refer to **Attachment B, MPR-16 Figure**, for a map of the proposed MPR-16 work areas. Refer to **Attachment C, MPR-16 Site Photographs**, for pictures of the current conditions of the MPR-16 work areas.

Environmental Impact: Utilization of the MPR-16 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 or other agency. No special-status species were identified within the proposed MPR-16 work areas. MPR-16 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-16 are estimated in the table below:

MPR-16 Work Area	Developed	Bare Ground	Total
WA 20	-	200 sf	200 sf (<0.01 acre)
WA 21	200 sf	-	200 sf (<0.01 acre)
Total:	200 sf (<0.01 acre)	200 sf (<0.01 acre)	400 sf (<0.01 acre)

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-16 work areas are located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference:			
Biological resources along the Project alignment were studied, reviewed, and documented as part of the TL6975 Project's Proponent's Environmental Assessment (PEA). Biological Resources were also analyzed within the CPUC-conducted CEQA review process. A pre-construction survey was conducted for the MPR-16 work areas on September 14, 2022. There is no habitat located within the MPR-16 work areas and the work areas are within a commercial, developed area. Therefore, biological monitoring is not anticipated to be required for MPR-16 activities. There were no special-status plant or animal species observed during the pre-construction survey. Pre-construction nesting bird surveys are not anticipated to be required as the use of the MPR-16 work areas is scheduled to take place outside of the nesting season (February 15 – August 31).			
Cultural	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Cultural Survey Report Reference:			
Cultural resources within the Project's study area (including the MPR-16 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 cultural resources or archaeological sites within the MPR-16 work areas, therefore cultural monitoring is not anticipated to be required.			

Disturbance Acreage Changes: Yes No

MPR-16 would result in 200 square feet (<0.01 acre) of additional temporary disturbance to the Project as approved.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Loc 20 (Original)	2,864 sf	50 sf	2,914 sf (0.07 acre)
Loc 21 (Original)	2,958 sf	38 sf	2,996 sf (0.07 acre)
Total (Original):	5,822 sf (0.13 acre)	88 sf (<0.01 acre)	5,910 sf (0.14 acre)
WA 20 (New)	200 sf	-	200 sf (<0.01 acre)
WA 21 (New)	200 sf	-	200 sf (<0.01 acre)
Total (New):	200 sf (<0.01 acre)	-	200 sf (<0.01 acre)

Note: the total impact area for MPR-16 is only 200 square feet because only one site (two anchor blocks) will be used.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, Seismicity, Paleontological Resources	<input type="checkbox"/> Y	MPR-16 does not involve the installation of any new facilities or performance of any new activities, nor are any ground disturbing activities proposed. Accordingly, MPR-16 would not be expected to affect geology, seismicity, or paleontological resources differently than what was proposed in the IS/MND, Section 3.7.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-16 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-16 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-16 work areas 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-16 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input type="checkbox"/> Y	The proposed MPR-16 activities would not affect any jurisdictional or non-jurisdictional drainages and all activities would be performed in compliance with the Project's SWPPP. MPR-16 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.
	<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-16 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-16 work areas. In addition, there is no ground disturbance proposed in MPR-16. 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-16 would not require agency or tribal consultation in relation to cultural resources.
	<input checked="" type="checkbox"/> N	
Tribal Cultural Resources	<input type="checkbox"/> Y	As stated in the previous section, the MPR-16 work areas 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.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-16 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 construction activities at Locations 20 and 21. The implementation of the proposed anchor blocks will not affect the anticipated traffic control activities. Pedestrians, bikes and non-motorized transit would be escorted safely around the work areas by the traffic control crew as needed. Accordingly, traffic and circulation impacts resulting from MPR-16 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-16 activities following completion of construction activities. MPR-16 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 ROW permit and associated traffic control plans issued by the City of San Marcos.
	<input type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	MPR-16 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-16 request. In addition, the same requirements regarding
	<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.
		<p>fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-16 work areas.</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-16 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>
Agency Consultation?	<input type="checkbox"/> Y	MPR-16 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input checked="" type="checkbox"/> Y	<p>The MPR-16 work areas are not located within 100 feet of sensitive receptors and the proposed use of the anchor blocks at Location 20 or 21 would not be expected to increase the construction noise level at either location as no new motorized equipment would be utilized. In addition, as the MPR-16 work areas are directly adjacent to the previously approved work areas for Locations 20 and 21, the proposed activities would not be expected to create any significant change to 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-16 work areas would take place in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP).</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-16 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	<p>MPR-16 would approve the use of temporary anchor blocks during the wire stringing activities in Segment 1 (See Attachment B, MPR-16 Figure). The visual character of the surrounding area is developed with transmission poles being a prominent feature along the length of San Marcos Boulevard. No permanent change in impacts to aesthetics or visual resources would result from MPR-16. The MPR-16 work areas are also not located within a key observation point (KOP), scenic vista or other scenic resource identified in the IS/MND. Therefore, MPR-16 would not result in a substantial increase in severity of an existing impact or create a new significant impact from those analyzed and disclosed within the Project's IS/MND.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-16 would not require agency consultation relating to aesthetics or visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input type="checkbox"/> Y	There is no habitat or other biological resources present in the MPR-16 work areas and no vegetation trimming or removal is anticipated to be required. Accordingly, there are no impacts to habitat

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	proposed in MPR-16, and 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 are not anticipated to be required as the use of the MPR-16 work areas is scheduled to take place outside of the nesting season (February 15 – August 31).
Agency Consultation?	<input type="checkbox"/> Y	MPR-16 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	The MPR-16 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. In addition, there are no significantly new activities proposed, extension in work schedule, or increase in motorized equipment or personnel required as a result of MPR-16. Therefore, MPR-16 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-16 would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

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

ATTACHMENT B
MPR-16 Figure

S RANCHO SANTA
FE RD

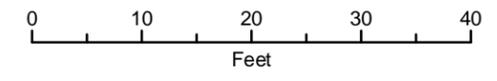
W SAN MARCOS BLVD

TL6975 SAN MARCOS to ESCONDIDO PROJECT

MPR 16
Additional Work Areas
San Diego County, CA

LEGEND

-  State Highway
-  Municipal Boundary
- Proposed Project**
-  Replace Existing with Pier Foundation
-  No Work / Information Only
-  Guard Structures
-  Segment 1 - Rebuild
-  Temporary Work Area
-  Permanent Work Area or Grading Impacts
-  Existing ROW
-  Approximate Additional ROW Required
- MPR-16 Components**
-  Additional Temporary Work Areas

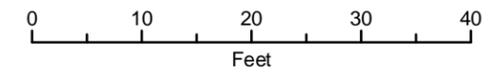
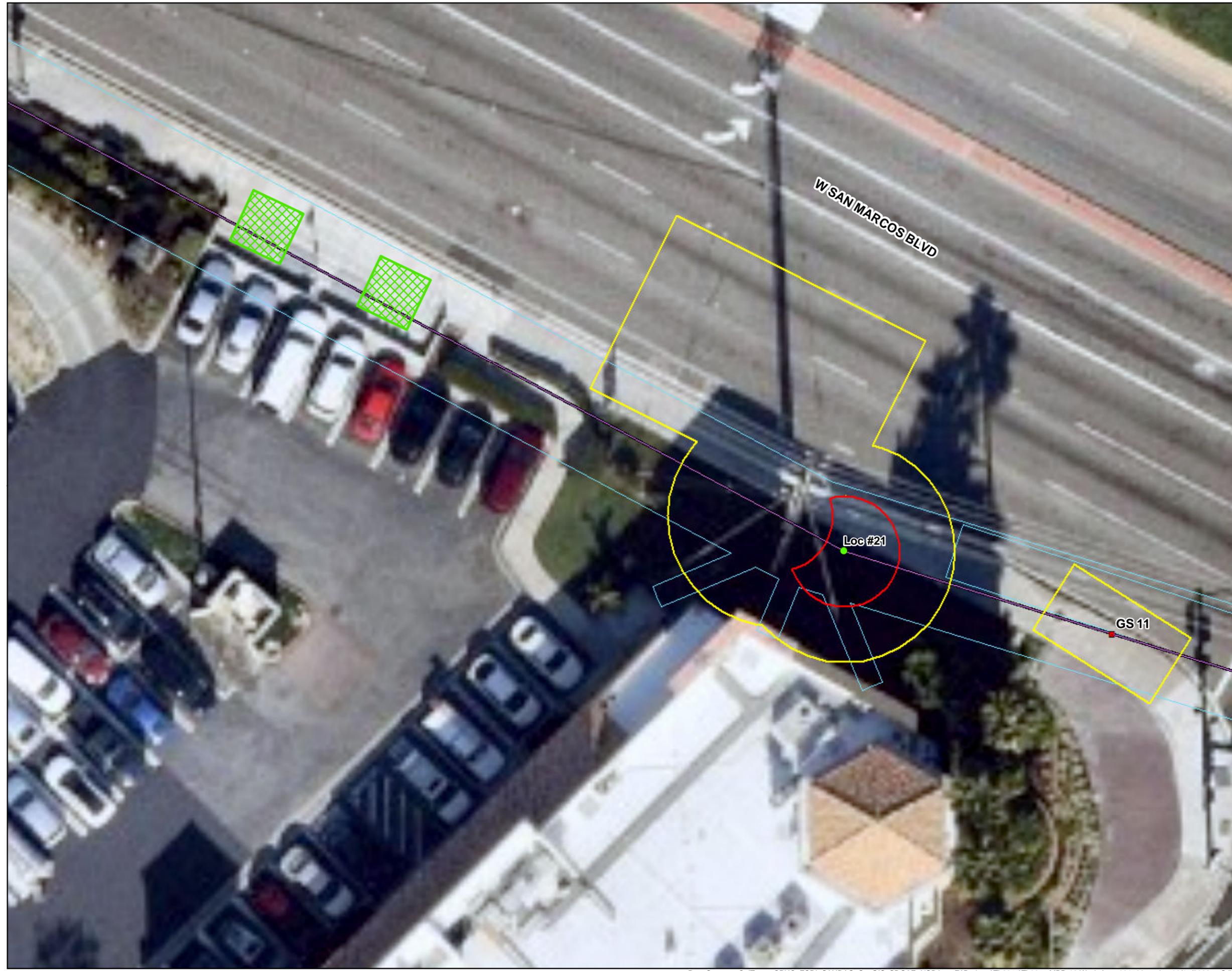


**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**

**MPR 16
Additional Work Areas
San Diego County, CA**

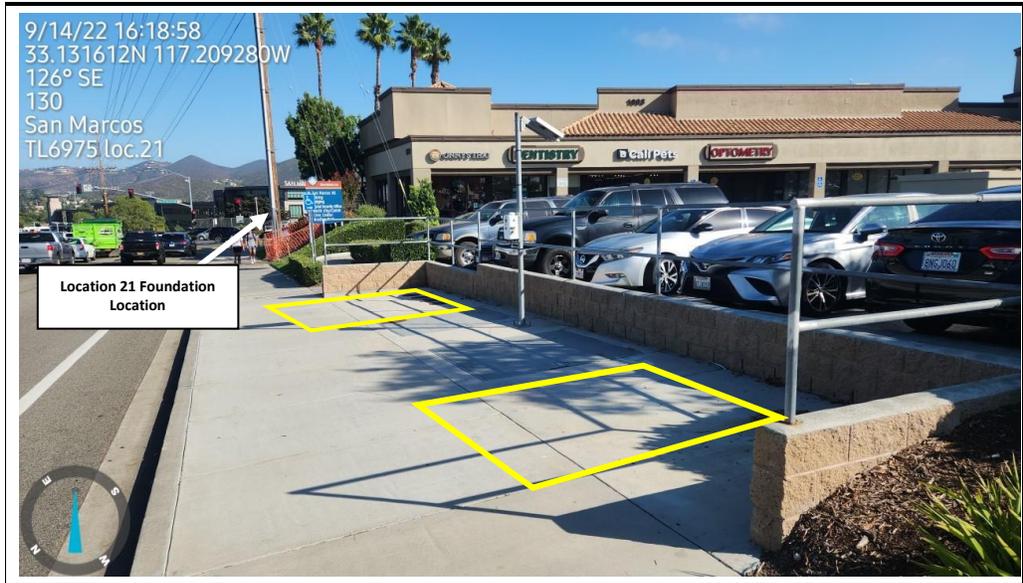
LEGEND

-  State Highway
-  Municipal Boundary
- Proposed Project**
-  Replace Existing with Pier Foundation
-  Guard Structures
-  Segment 1 - Rebuild
-  Temporary Work Area
-  Permanent Work Area or Grading Impacts
-  Existing ROW
- MPR-16 Components**
-  Additional Temporary Work Areas

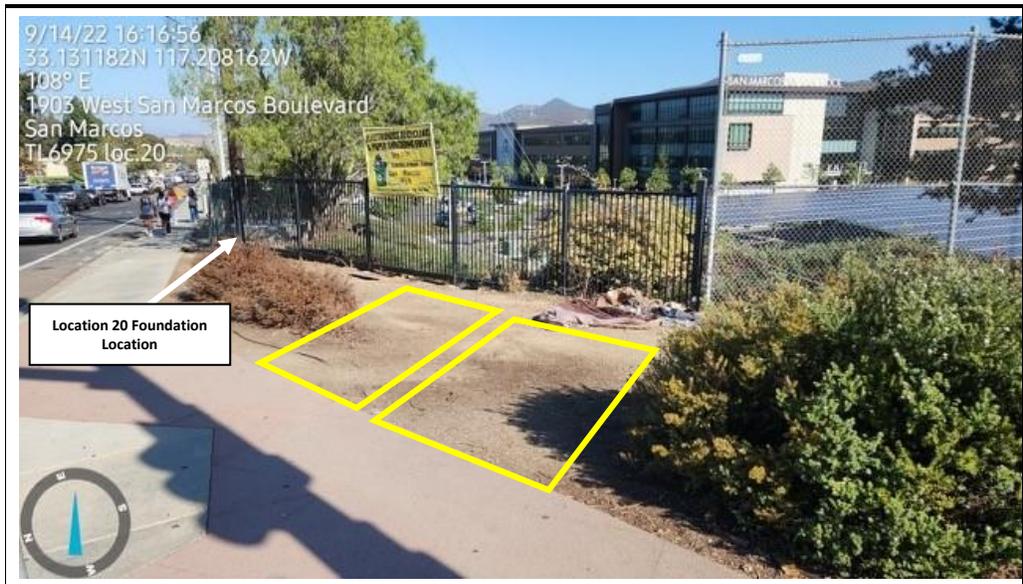


ATTACHMENT C
MPR-16 Site Photographs

MPR-16 PHOTO LOG



Photograph 1:
View of the proposed location of the two temporary anchor blocks at Location 21. Facing: Southeast



Photograph 2:
View of the proposed location of the two temporary anchor blocks west of Location 20. Facing: East