



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

September 29, 2022

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

Re: Minor Project Refinement No. 17 for the TL 6975 San Marcos to Escondido Project

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is submitting a Minor Project Refinement No. 17 (MPR-17) 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-17 to utilize an additional temporary work area at Location 49 and to reconstruct a portion of the screen wall around the pole site in Segment 1 of the TL6975 San Marcos to Escondido Project (Project). Please refer to **Attachment A, MPR-17 Form, Attachment B, MPR-17 Figure and Attachment C, MPR-17 Site Photographs** to view the MPR-17 elements and work area.

MPR-17 Request for Approval

SDG&E respectfully requests the approval of MPR-17 for the use of the new temporary work area for the reconstruction of the screen wall at Location 49 by October 12, 2022. MPR-17 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 wye@sdge.com.

Sincerely,

A handwritten signature in black ink that reads '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-17 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 29, 2022

Report No.: 17

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s):

- The Location 49 Revised Work Area (WA 49) is located primarily within SDG&E ROW and partially on private property.

Location/Milepost: The MPR-17 work area is located in the City of San Marcos adjacent to Palomar Airport Road.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed Minor Project Refinement No. 17 (MPR-17) work area is estimated as follows:

- Approximately 2,075 square feet (0.05 acre) in developed and ornamental vegetation.

Sensitive Resources: Location 49 is located in a paleontologically sensitive area and within 100 feet of a (noise) sensitive receptor.

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

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-17 for a revised work area at Location 49 in order to reconstruct a portion of the screen wall around the pole site for the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-17 Figure** and **Attachment C, MPR-17 Site Photographs**, for an overview of the proposed MPR-17 work area.

The new pole at Location 49 will be installed and a portion of the existing wall will be removed as the wall is in conflict with the new pole location. Once the foundation is in and the pole is set, the new portion of the screen wall will be constructed around the pole site utilizing an additional 2,075 square feet (0.05 acre) of temporary work area proposed in this MPR request. Ornamental vegetation will be trimmed within the additional temporary work area. Please see **Attachment B** to view the new wall location. Post-construction restoration of the temporary portion of WA 49 will be performed in coordination with the property owner.

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 and Palomar Airport Road, including at Location 49. 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.

Any damage to sidewalks or public roadways resulting from MPR-17 activities, including any curb damage, will be immediately repaired following completion of MPR-17 construction activities in accordance with APM PS-4. The temporary disturbance associated with the MPR-17 work areas will be stabilized in accordance with the SWPPP. The revised plans for the screen wall at Location 49 were approved on September 20, 2022, in an addendum to the San Marcos Grading Permit No. GP21-00003.

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

Original Condition: The MPR-17 work area is located within the geographic study area of the IS/MND and is adjacent to or within approved work areas; therefore, they have been previously analyzed. The conditions of the work area have not changed since the Project was originally designed; however, field constructability review revealed the need to utilize the MPR-17 work area for the reasons described below.

Justification for Change:

The existing screen wall within the approved work area for Location 49 was built within the SDG&E easement. During constructability review it was determined this screen wall conflicts with the new pole foundation at Location 49 due to the size of the pier foundation (approximately 7 feet in diameter). Therefore, a portion of the screen wall within the approved work area for Location 49 will need to be removed to accommodate the new pole location. With concurrence from the property owner and approval from the City of San Marcos (Grading Permit GP21-00003), the screen wall will be reinstalled around the pole site. In order to reconstruct the screen wall, an additional temporary work area of 2,075 square feet will be required.

Maps & Figure: Refer to **Attachment B, MPR-17 Figure**, for a map of the proposed MPR-17 work area and relocated screen wall location. Refer to **Attachment C, MPR-17 Site Photographs**, for pictures of the current conditions of the MPR-17 work area.

Environmental Impact: Utilization of the MPR-17 work area and relocation of the portion of screen wall 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 with jurisdiction over the Project. No special-status species were identified within the proposed MPR-17 work area. MPR-17 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-17 are estimated as follows; 525 square feet (0.01 acre) developed and 1,550 square feet (0.04 acre) ornamental vegetation.

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-17 screen wall and temporary work area 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:			
<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 MPR-17 on September 7, 2022. 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 no habitat located within the approved work area for Location 49 or the proposed MPR-17 work area. There were no special-status plant or animal species observed during the pre-construction survey, and biological monitoring is not anticipated to be required. The work at Location 49, including MPR-17 activities, is anticipated to be completed before the start of nesting season (February 15- August 31), therefore pre-construction nesting bird surveys are not anticipated to be required.</p>			
Cultural	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Cultural Survey Report Reference:			
<p>Cultural resources within the Project’s study area (including Location 49 and the MPR-17 work 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. Location 49 and the MPR-17 work area are not located in a culturally sensitive area and cultural monitoring is not required.</p>			

<u>Disturbance Acreage Changes:</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
MPR-17 would result in 2,075 square feet (0.05 acre) of additional temporary disturbance at Location 49.			
Disturbance acreage changes are summarized as follows:			
Location	Temporary Impact	Permanent Impact	Total
Loc 49 (Original)	3,199 sf	38 sf	3,237 sf (0.07 acre)
Additional MPR-17 area (New)	2,075 sf	-	2,075 sf (0.05 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>As the new pier foundation at Location 49 conflicts with the existing screen wall, a portion of the screen wall will be removed for pole installation activities. SDG&E will rebuild the portion of the screen wall around the new pole site. The screen wall design has been approved by the City of San Marcos in an addendum to the Grading Permit No.GP21-00003 approved September 20, 2022. WA 49 is located in a paleontologically sensitive area so ground disturbance will be monitored for paleontological resources during MPR-17 activities in accordance with the Paleontological Resources Monitoring and Mitigation Plan (PRMMP).</p> <p>As stated in Section 3.7.1 of the IS/MND, the area in which Location 49 and the MPR-17 work area are located is characterized by moderately corrosive soils and a general susceptibility to landslides. Location 49 is also located in an area with highly expansive soils. 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 Locations 49 would still apply as the geologic conditions have not changed. Additional seismic testing was also performed for Location 49 and recommendations from the supplemental Geotechnical Report and the seismic testing were incorporated into the revised designs at Location 49.</p> <p>Vegetation trimming would occur within WA 49. Erosion control BMPs would be incorporated in accordance with the SWPPP and the Erosion Control Plan attached to the San Marcos Grading Permit. There are no other changes to the work scope at Location 49 proposed within MPR-17 that would be expected to affect geology, seismicity, or paleontological resources differently than what was proposed in the IS/MND, Section 3.7. Following MPR-17 activities, the Location 49 work area 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 to include the construction of the screen wall around the new pole site at Location 49 was approved on September 20, 2022.
	<input type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	There are no significantly different activities being proposed in MPR-17 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-17 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	

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-17 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input type="checkbox"/> Y	There are no jurisdictional or non-jurisdictional drainages that would be affected by the use of WA 49. MPR-17 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, SWPPP BMPs would be installed to prevent off-site sedimentation.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-17 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 Location 49 work area or MPR-17 work area. 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-17 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-17 work area is not located within a known archaeological site, nor are there any known cultural resources within the work area. 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-17 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>There are no new traffic control activities or anticipated traffic impacts that would result from the MPR-17 activities within WA 49 that would be different from those disclosed in the IS/MND, Section 3.17. Traffic control activities at Location 49 will take place in accordance with the approved ROW permit and traffic control plan N. ROW/22-00131 issued by the City of San Marcos.</p> <p>Accordingly, traffic and circulation impacts resulting from MPR-17 are anticipated to be similar to those disclosed in the IS/MND, Section 3.17. In addition, impacts related to traffic control activities on Palomar Airport Road were anticipated and analyzed in the IS/MND.</p> <p>In compliance with APM PS-4, SDG&E would repair any damage to public roads, sidewalks or curbs resulting from MPR-17 activities following completion of construction activities. MPR-17 activities would not involve a schedule extension or significantly different</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.												
		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.												
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	MPR-17 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-17 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to MPR-17. 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-17 would not affect air quality or emissions in a manner substantially different from the impacts assessed as part of the Project's IS/MND.												
	<input checked="" type="checkbox"/> N													
Agency Consultation?	<input type="checkbox"/> Y	MPR-17 would not require agency consultation relating to air quality.												
	<input checked="" type="checkbox"/> N													
Noise and Vibration	<input checked="" type="checkbox"/> Y	<p>WA 49 is within 100 feet of a sensitive receptor and noise monitoring would be performed as needed in compliance with the Construction Noise Reduction and Mitigation Plan (CNRMP). As the MPR-17 work area is directly adjacent to the previously approved work area at Location 49, 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.</p> <p>The equipment utilized for wall construction (excavator, loader, crew truck, compressor, etc.) within WA 49 would create similar noise levels as equipment utilized for work area preparation and foundation drilling (excavator, drill rig, crew truck, compressor, etc.). 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.</p> <table border="1" data-bbox="581 1661 1446 1927"> <thead> <tr> <th data-bbox="581 1661 1015 1759">Equipment</th> <th data-bbox="1019 1661 1446 1759">Hourly Average dBA at 100 feet per Table 3.13-13 in IS/MND</th> </tr> </thead> <tbody> <tr> <td data-bbox="581 1766 1015 1795">Excavator</td> <td data-bbox="1019 1766 1446 1795">69 dBA</td> </tr> <tr> <td data-bbox="581 1801 1015 1831">Loader</td> <td data-bbox="1019 1801 1446 1831">67 dBA</td> </tr> <tr> <td data-bbox="581 1837 1015 1866">Crew Truck</td> <td data-bbox="1019 1837 1446 1866">63 dBA</td> </tr> <tr> <td data-bbox="581 1873 1015 1902">Compressor</td> <td data-bbox="1019 1873 1446 1902">66 dBA</td> </tr> <tr> <td data-bbox="581 1908 1015 1938">Drill Rig</td> <td data-bbox="1019 1908 1446 1938">64 dBA</td> </tr> </tbody> </table>	Equipment	Hourly Average dBA at 100 feet per Table 3.13-13 in IS/MND	Excavator	69 dBA	Loader	67 dBA	Crew Truck	63 dBA	Compressor	66 dBA	Drill Rig	64 dBA
	Equipment	Hourly Average dBA at 100 feet per Table 3.13-13 in IS/MND												
Excavator	69 dBA													
Loader	67 dBA													
Crew Truck	63 dBA													
Compressor	66 dBA													
Drill Rig	64 dBA													
<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>Although the reconstruction of the wall at Location 49 will extend the construction schedule at this location by approximately 1 week, construction would take place during daytime hours and construction noise would remain similar to the activities anticipated in the IS/MND as shown above. In addition, noise mitigation measures would be implemented per Section 4.1 of the CNRMP.</p> <p>Accordingly, MPR-17 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-17 work areas would take place in accordance with the CNRMP.</p>
Agency Consultation?	<input type="checkbox"/> Y	MPR-17 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-17 would involve the reconstruction of a portion of the screen wall at Location 49 to accommodate the new pier foundation. Although this change may be noticed by pedestrians and motorists on Palomar Airport Road or in the adjacent neighborhood, this minor change would not be expected to result in a substantial impact to the existing visual character or quality of public views beyond what was analyzed in the IS/MND, Section 3.1. This is supported by the fact that the area in which WA 49 is located is considered to have low to moderate visual sensitivity due to the developed nature of its surroundings.</p>
	<input type="checkbox"/> N	<p>In addition, the screen wall would be reconstructed to match the existing screen wall and the temporary portion of WA 49 would be restored in coordination with the property owner. WA 49 is not within a KOP, scenic vista or other scenic resource identified in the IS/MND. Therefore, MPR-17 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 checked="" type="checkbox"/> Y	The screen wall at Location 49 would be reconstructed in accordance with the addendum to the approved City of San Marcos Grading Permit No. GP21-00003.
	<input type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	Ornamental vegetation at Location 49 would be trimmed with hand tools 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. BMPs would be installed at WA 49 following vegetation trimming to prevent off-site sedimentation. Please see Attachment C, MPR-17 Site Photographs , for photos of current conditions of the MPR-17 site.










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>There are no impacts to habitat proposed in MPR-17, therefore biological monitoring is not required 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.</p> <p>Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-17 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-17 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	The MPR-17 work area 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. Therefore, MPR-17 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-17 would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

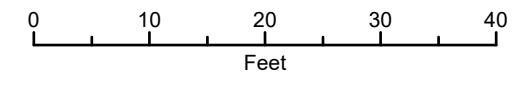
Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	10/10/2022	Melinda Kimble		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	10/10/2022	William Yee	<i>William R. Yee</i>	<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	10/7/2022	Trevor Pratt	<i>Trevor Pratt</i>	<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-17 Figure

**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR-17
Additional Work Areas
San Diego County, CA

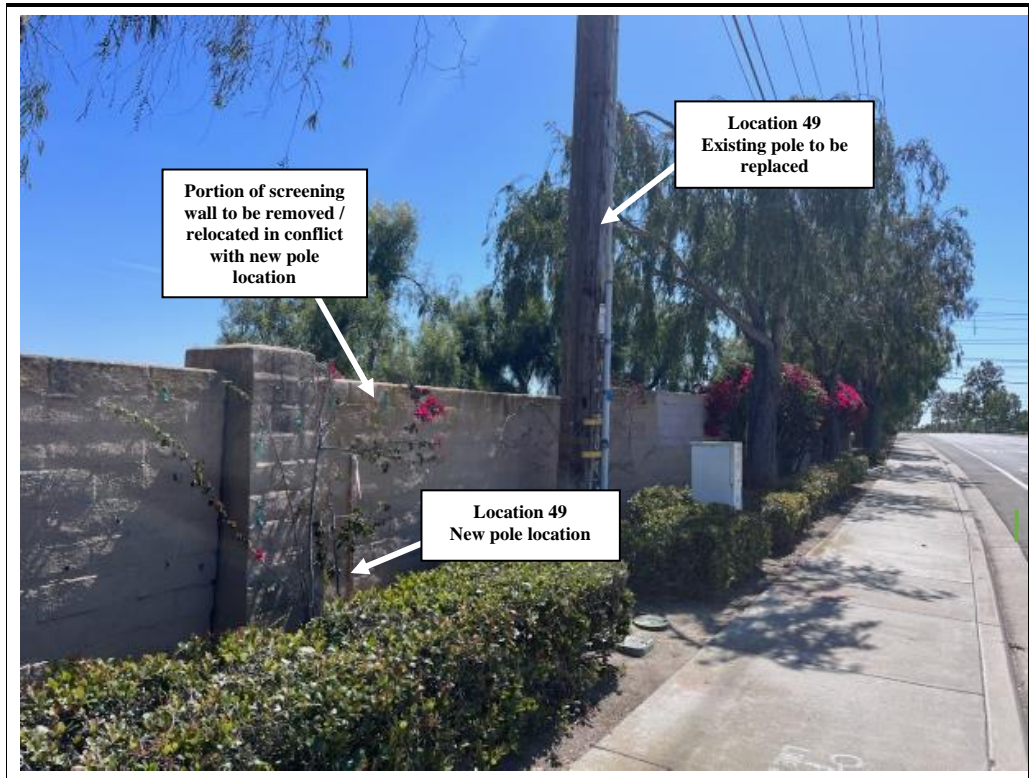
LEGEND

-  State Highway
-  Municipal Boundary
- Proposed Project**
-  Replace Existing with Pier Foundation
-  Segment 1 - Rebuild
-  Temporary Work Area
-  Permanent Work Area or Grading Impacts
-  Existing ROW
- MPR-17 Components**
-  Relocated Screen Wall Portion
-  Additional Temporary Work Area



ATTACHMENT C
MPR-17 Site Photographs

MPR-17 PHOTO LOG



Photograph 1:
View of Location 49 from Palomar Airport Road. The portion of the screen wall in conflict with the new pole location at Location 49 will be removed and replaced.
Facing: Southwest



Photograph 2:
View of the revised permanent and temporary work area at Location 49 and the additional requested work area (WA 49). The relocated screening wall will be installed within the previously approved work area for Location 49.
Facing: South