



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

January 6, 2023

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

Re: Minor Project Refinement No. 18 for the TL 6975 San Marcos to Escondido Project

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is submitting a Minor Project Refinement No. 18 (MPR-18) 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-18 for the relocation of the new pole at Location 4, the installation of a meandering sidewalk around the new pole, and an additional work area to accommodate these modifications in Segment 1. Please refer to **Attachment A, MPR-18 Form, Attachment B, MPR-18 Figure** and **Attachment C, MPR-18 Site Photographs** to view the MPR-18 elements and work area.

MPR-18 Request for Approval

SDG&E respectfully requests the approval of MPR-18 for the relocation of the new pole at Location 4, the installation of a meandering sidewalk around the new pole, and an additional work area to accommodate these modifications by Friday, January 13, 2023. MPR-18 activities would take place in accordance with conditions outlined in the CPUC's NTP-1 approval letter, as well as requirements in the IS/MND and MMRCP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at wye@sdge.com.

Sincerely,

William R. Yee

William Yee
TL6975 Environmental Project Manager

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

ATTACHMENT A
MPR-18 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: January 6, 2023

Report No.: 18

Date Approved: January 12, 2023

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s):

- The MPR-18 Additional Work Area is located partially within County of San Diego right-of-way (ROW) and partially on private property.

Location/Milepost: The MPR-18 work area is located in San Diego County.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed Minor Project Refinement No. 18 (MPR-18) work area is estimated as follows:

- 1,125 square feet (0.03 acre) in developed and ornamental

Sensitive Resources: The MPR-18 work area is located within an area with low paleontological potential, where monitoring is required for excavations over 10 feet in depth. There are no other sensitive resources within the MPR-18 work area. See resource discussions below.

Modification From:

- Permit Plan/Procedure Specification Drawing
 Mitigation Measure Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-18 for the relocation of the new pole at Location 4, the installation of a meandering sidewalk around the new pole, and an additional work area to accommodate these modifications for the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-18 Figure** and **Attachment C, MPR-18 Site Photographs**, for an overview of the proposed MPR-18 work area.

- **Location 4 Proposed Modifications:** The new pole at Location 4 will be installed approximately 25 feet northwest of the original location shown in NTP-1 and IS/MND mapping. An additional 35 square-foot permanent work area will be required at Location 4, where the existing sidewalk will be extended within County of San Diego ROW. An additional

1,090 square-foot temporary work area will be required at this location to complete the pole installation, sidewalk extension, and underground distribution tie-in work. Trenching will be required in order to intercept and reroute the distribution conduit to the new pole at Location 4 (see **Attachment B**). Most of the underground work will take place within the previously approved work area for Location 4. The ornamental grass within the permanent portion of the work area will be removed.

A sidewalk construction permit was acquired from the County of San Diego (DPW2022-RWCONP-80786) on August 31, 2022. This permit authorized the installation of a meandering sidewalk at Locations 4-6 in order to meet Americans with Disabilities Act (ADA) clearance requirements. An addendum to this permit was submitted to the County of San Diego to include the meandering sidewalk around the relocated Location 4 pole location and is currently pending approval.

Prior to the start of MPR-18 construction activities, the adjacent property owners will be notified of the upcoming construction activities. The affected property owners have been made aware of the pole relocation and associated activities. Please see **Attachment C** to see photographs of the existing conditions of the proposed work area. Any damage to sidewalks or public roadways resulting from MPR-18 activities, including any curb damage, will be immediately repaired following completion of MPR-18 construction activities in accordance with APM PS-4. The temporary disturbance associated with the MPR-18 work area will be stabilized in accordance with the SWPPP or otherwise restored in coordination with the property owner.

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

Original Condition: The MPR-18 work area is located within the geographic study area of the IS/MND and is adjacent to the approved work area for Location 4; therefore, it has been previously analyzed. The conditions of the Location 4 work area have not changed since the Project was originally designed; however, field constructability review revealed the need to utilize the MPR-18 work area for the reasons described below.

Justification for Change:

Pre-construction potholing took place at Location 4 in October 2022 to determine if groundwater was present and at what depth. It was discovered that groundwater was present at a depth of approximately five feet which was much higher than anticipated. This resulted in constructability complications at Location 4. Prior to this discovery, the construction plan was to remove the existing pole and install the new pole as a same-hole set on the same day, requiring an approximately 10-hour outage. Following the discovery of the presence of groundwater at the shallow depth of five feet, this plan will no longer be feasible as the pole hole will likely become unstable once the existing pole is removed. A same-hole set at this location would require a wet-hole installation which is not feasible in its current location due to space restrictions and limitations regarding outages.

As an alternative, it is being proposed in this MPR-18 request that Location 4 be moved 25 feet northwest. This location would allow enough space for the wet hole direct-bury pole installation and would avoid the need for the multiple day outage that would be required for a same-hole set. As a result of the movement of Location 4, the existing sidewalk must be extended in order to allow pedestrian flow around the new pole sites, and to meet ADA sidewalk clearance requirements. In addition, underground trenching will take place in order to intercept and reroute the underground conduit.

Maps & Figure: Refer to **Attachment B, MPR-18 Figure**, for a map of the proposed MPR-18 work area. Refer to **Attachment C, MPR-18 Site Photographs**, for pictures of the current conditions of the MPR-18 work area.

Environmental Impact: Utilization of the MPR-18 work area 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-18 work area. MPR-18 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-18 are estimated in the table below:

Developed	Ornamental	Total
685 sf (0.02 acre)	440 sf (0.01 acre)	1,125 sf (0.03 acre)

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-18 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:			
<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-18 work area on November 16, 2022. There is no habitat located within the MPR-18 work area. 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, the MPR-18 work area is located within developed/paved ground and ornamental vegetation. Therefore, biological monitoring is not anticipated to be required for MPR-18 activities. 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 ground disturbing activities associated with MPR-18 during the nesting season (February 15 – August 31) in accordance with APM BIO-6.</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 the MPR-18 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. There are no known cultural resources or archaeological sites within the MPR-18 work area, therefore cultural monitoring is not anticipated to be required.</p>			

Disturbance Acreage Changes: Yes No

MPR-18 would result in 1,090 square feet (0.03 acre) of additional temporary disturbance and 35 square feet (<0.01 acre) of additional permanent disturbance to the Project as approved.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Loc 4 (Original)	2,738 sf	5 sf	2,743 sf (0.06 acre)
WA 4 (New)	1,090 sf	35 sf	1,125 sf (0.03 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-18 would involve ground disturbance to install the new pole and underground conduit at Location 4, as well as minor ground disturbance to construct the meandering sidewalk, proposed ground disturbance would still take place in approximately the same area as approved in the IS/MND as the new MPR-18 work area is immediately adjacent to the previously approved work area for Location 4.</p> <p>The MPR-18 work area is located within an area with low paleontological potential per the Paleontological Resources Monitoring and Mitigation Plan (PRMMP). In accordance with the PRMMP, paleontological monitoring will take place for excavations of greater than 10 feet. Therefore, monitoring will take place for drilling of the new pole hole at Location 4 but is not anticipated to be required for underground trenching or sidewalk installation activities, as those will be less than 10 feet in depth.</p> <p>There are no other changes to the work scope proposed within MPR-18 that would be expected to affect geology, seismicity, or paleontological resources differently than what was proposed in the IS/MND, Section 3.7. Therefore, MPR-18 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-18 activities, the temporary portions of the work areas will be stabilized in accordance with the SWPPP or otherwise restored in coordination with the property owner.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input checked="" type="checkbox"/> Y	<p>An addendum to sidewalk construction permit (No. DPW2022-RWCONP-80786) is pending approval from the County of San Diego to include the sidewalk extension around the new pole location. A copy of this permit will be submitted to the CPUC once approved and prior to commencement of construction for any feature covered by the permit.</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.
Hazardous Materials and Waste	<input type="checkbox"/> Y	There are no significantly different activities being proposed in MPR-18 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-18 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-18 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 MPR-18 activities. Erosion control and stormwater BMPs would be implemented during construction as needed in accordance with the Project's SWPPP. MPR-18 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	
Agency Consultation?	<input type="checkbox"/> Y	MPR-18 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-18 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-18 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-18 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-18 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	Traffic control will be required during MPR-18 activities. A traffic control permit was received from the County of San Diego (DPW2022-RWTCP-01051) which was submitted to the CPUC on September 1, 2022. Traffic control activities were anticipated to be required for the pole installation and intercept work at Location 4 in
	<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>the IS/MND and impacts related to traffic control on Discovery Street were analyzed in the IS/MND. Pedestrians, bikes and non-motorized transit would be escorted safely around the work area by the traffic control crew during construction. In addition, the installation of the meandering sidewalk will allow pedestrian flow around the new pole site in compliance with ADA requirements. Accordingly, traffic and circulation impacts resulting from MPR-18 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-18 activities following completion of construction activities. MPR-18 activities would not involve 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>
Agency Consultation?	<input checked="" type="checkbox"/> Y	All traffic control activities would be performed in compliance with approved traffic control plans issued by the County of San Diego.
	<input type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	<p>MPR-18 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-18 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-18 work area.</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-18 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-18 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input checked="" type="checkbox"/> Y	The MPR-18 work area is located within 100 feet of sensitive receptors and noise monitoring would take place as needed in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP) during construction activities. Prior to the start of MPR-18 construction activities, the adjacent property owners will be notified of the upcoming construction activities. The MPR-18 work area is located directly adjacent to the previously approved work area for Location 4. In addition, the new pole will be installed further away from sensitive receptors since the proposed pole location is

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
	<input type="checkbox"/> N	now in front of the golf course property instead of a private residence. As such, the proposed activities would not be expected to create a 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-18 work area would take place in accordance with the CNRMP.
Agency Consultation?	<input type="checkbox"/> Y	MPR-18 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	MPR-18 would approve the relocation of the new pole at Location 4 as well as the installation of a meandering sidewalk to meet ADA sidewalk requirements (See Attachment B, MPR-18 Figure). The visual character of the surrounding area is developed, with transmission poles being a prominent feature along the length of Discovery Street. The change that is being proposed in regard to the relocation of the pole is nearly imperceptible from the point of view of a motorist or pedestrian, as there are no poles being added, only shifted over. The relocation of the new pole at Location 4 will not change the height of the new pole.
	<input type="checkbox"/> N	In addition, the meandering sidewalk would be installed as an extension of an existing sidewalk, and this change would not alter the visual quality of the area or diminish its aesthetic value. The MPR-18 work area is also not located within a key observation point (KOP), scenic vista or other scenic resource identified in the IS/MND. Therefore, MPR-18 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.
Agency Consultation?	<input checked="" type="checkbox"/> Y	An addendum to sidewalk construction permit (No. DPW2022-RWCONP-80786) is pending approval from the County of San Diego to include the sidewalk extension around the new pole location. A copy of this permit will be submitted to the CPUC prior to performing any activities covered under the permit.
	<input type="checkbox"/> N	
Vegetation and Wildlife	<input type="checkbox"/> Y	MPR-18 would involve temporary disturbance of ornamental grass during construction activities as well as the permanent removal of ornamental grass where the meandering sidewalk will be installed. There is no other vegetation trimming or removal anticipated to be required during MPR-18 activities.
	<input checked="" type="checkbox"/> N	There are no impacts to habitat proposed in MPR-18, 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 ground disturbing activities associated with MPR-18 during the nesting season (February 15 – August 31) in accordance with APM BIO-6. No biological monitoring is anticipated to be required during MPR-18 activities. Although no new or altered APMs or MMs would be

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>required, the following APMs and MMs would be implemented for MPR-18 activities as needed, 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-18 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	The MPR-18 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 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-18. Therefore, MPR-18 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-18 would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

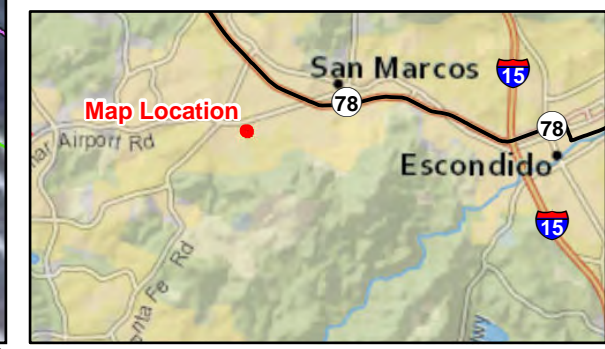
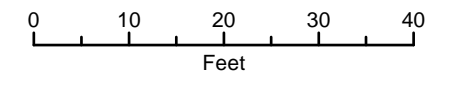
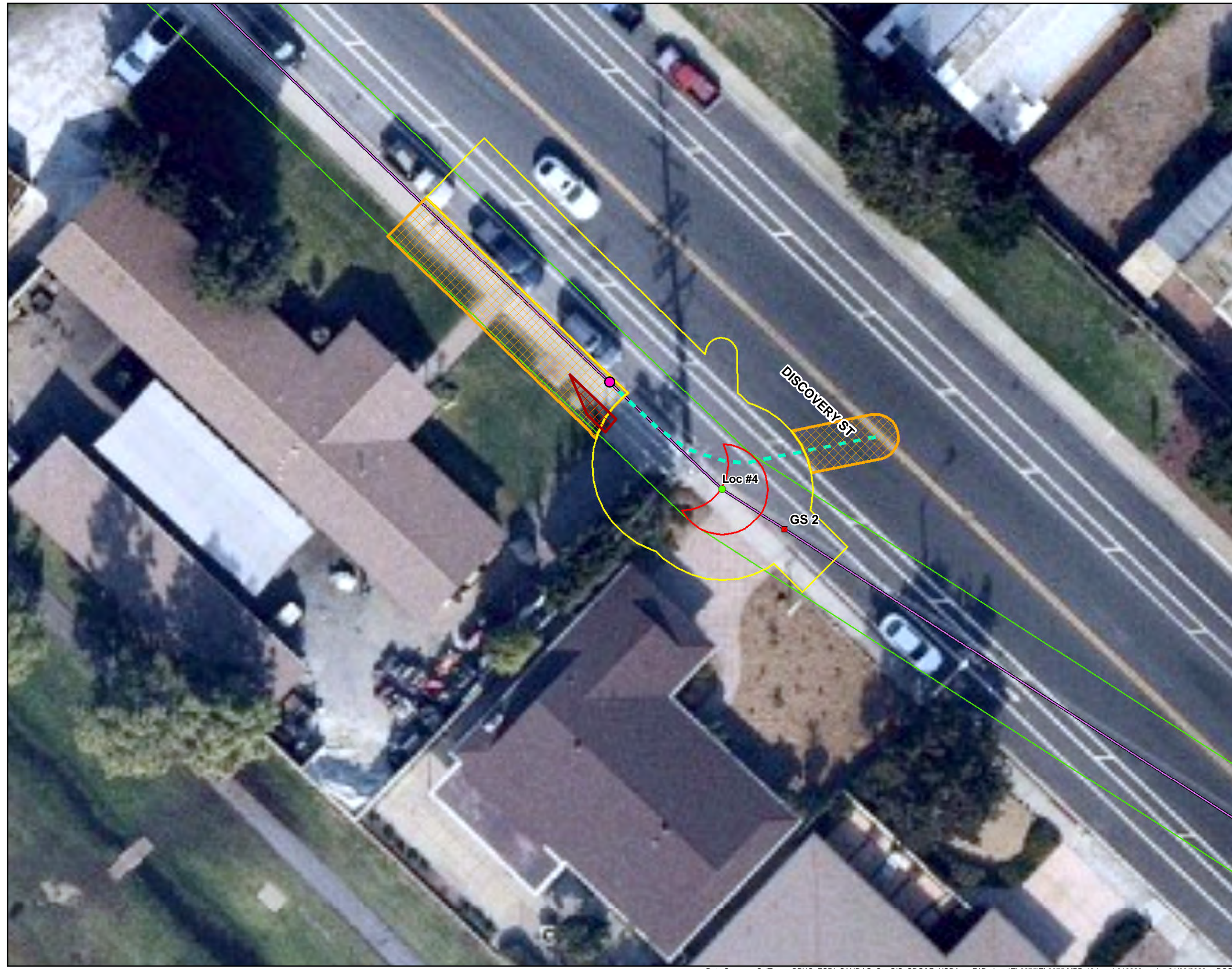
Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	1/12/2023	Melinda Kimble		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	1/12/2023	William Yee		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	1/12/2023	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-18 Figure

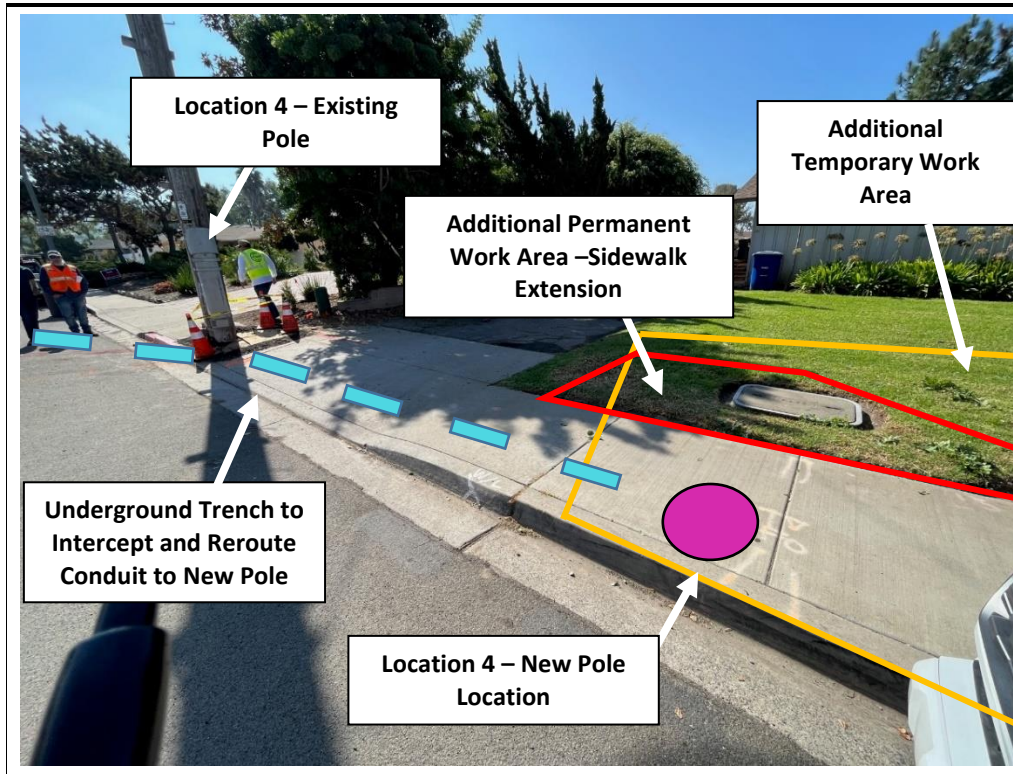
**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR-18
Location 4 Additional Work Area
San Diego County, CA

LEGEND

-  State Highway
-  Municipal Boundary
- Proposed Project**
 -  Replace Existing Pole
 -  Guard Structures
 -  Segment 1 - Rebuild
 -  Temporary Work Area
 -  Permanent Work Area or Grading Impacts
 -  Alignment in Franchise
- MPR-18 Components**
 -  New Pole Location
 -  New Underground Trench
 -  Additional Temporary Work Area
 -  Additional Permanent Work Area - Relocated Sidewalk

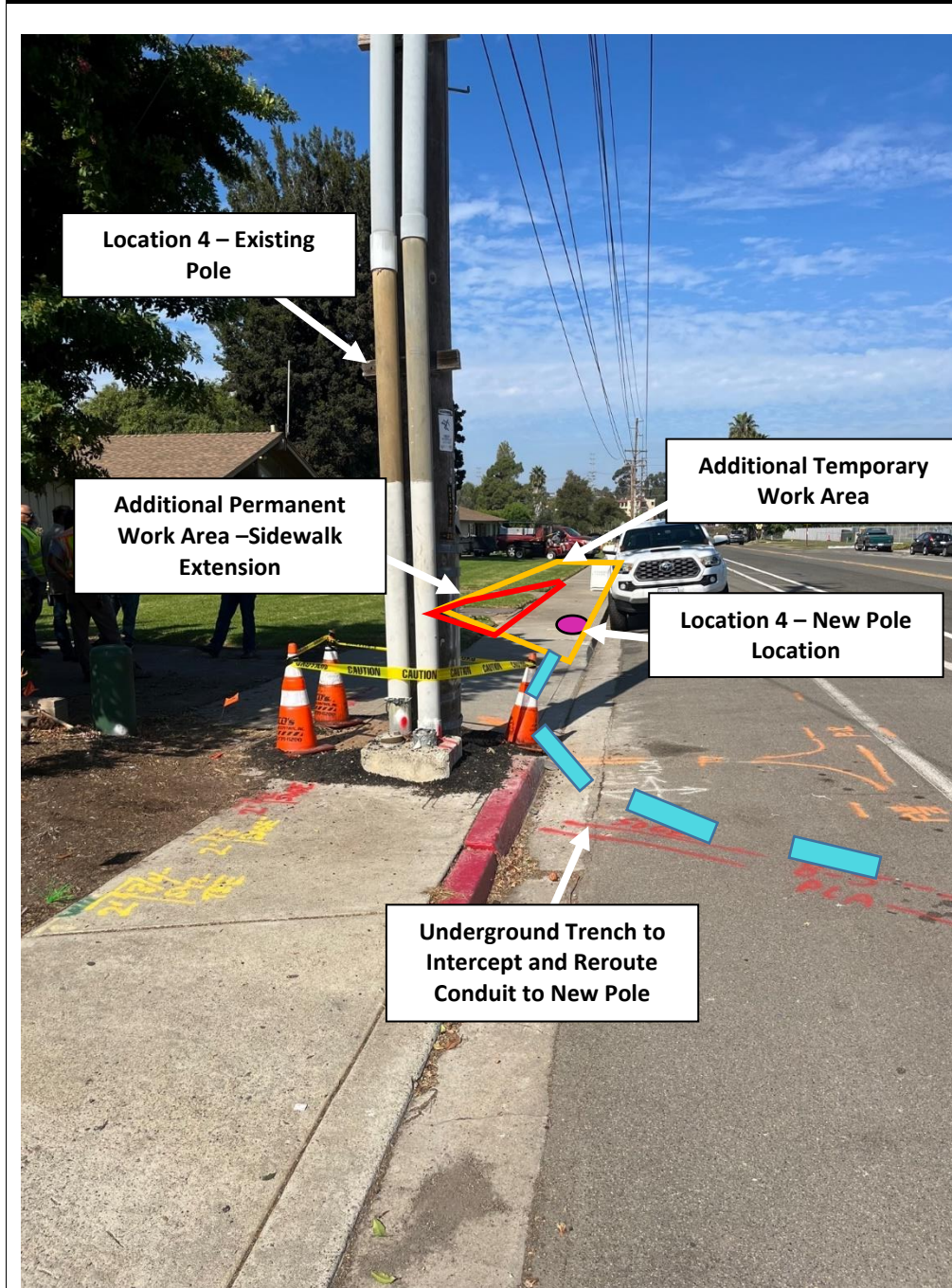


ATTACHMENT C
MPR-18 Site Photographs



Photograph 1:

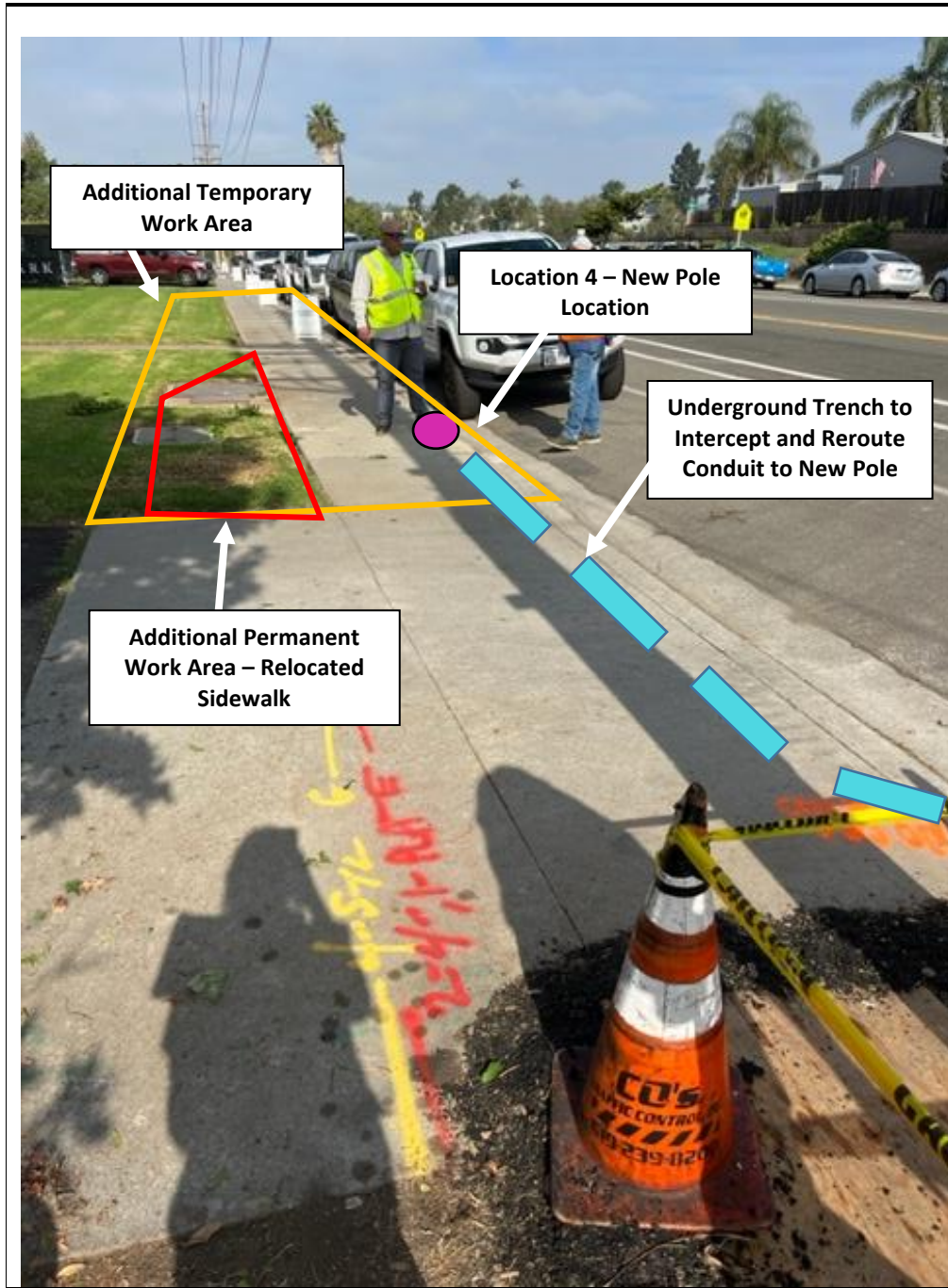
View of the existing and new Location 4 pole sites and the additional work area required for the new pole installation and sidewalk extension. Facing: South



Photograph 2:

View of the existing and new Location 4 pole sites and the additional work area required for the new pole installation and sidewalk extension.

Facing: Northwest



Photograph 3:

View of the existing and new Location 4 pole sites and the additional work area required for the new pole installation and sidewalk extension. Facing: North