Melinda A. Kimble
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San Diego Gas & Electric Company
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June 8, 2022

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

**Re: Notice to Proceed Request No. 3 to Construct the San Marcos to Escondido Tie Line 6975 Project (D.20-09-034).**

Mr. Pratt:

On September 24, 2020, the California Public Utilities Commission (CPUC) voted to grant San Diego Gas & Electric Company (SDG&E) a Permit to Construct (PTC) for the San Marcos to Escondido Tie Line (TL) 6975 69 kilovolt (kV) Project (Project or TL6975 Project) (Decision 20-09-034) contingent upon implementation of the Mitigation Monitoring, Reporting and Compliance Program (MMRCP). SDG&E requests approval of this Notice to Proceed Request No. 3 (NTPR-3) for construction activities at Structures 8, 11, 12, Guard Structures 6 and 7, Coupon Test Station 2 and Deepwell 11 in the vicinity of the intersection of West San Marcos Boulevard and Discovery Street as shown in *Attachment A, NTPR-3 Mapbook (Mapbook).* The Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) from the MMRCP and a description of their applicability to NTPR-3 is included in *Attachment B, MMRCP Requirements Tracking Table.* The approval of Project construction activities at these locations was contingent upon the completion of data recovery excavations per MM CUL-4, which was completed on May 25, 2022. Please see *Attachment C, Post Data Recovery Summary Report*, for more information. Descriptions of construction activities at these locations are included below. NTPR-3 activities will take place within the City of San Marcos, California. Project components identified herein are described in the Final Initial Study / Mitigated Negative Declaration (IS/MND) dated January 10, 2020 (State Clearinghouse No. 2019049009) and shown in the *NTPR-3 Mapbook.*

## 1.0 Description of Work and Comparison to Final IS/MND

The Project components described herein are consistent with the descriptions contained within the IS/MND and Final Decision. As discussed in the IS/MND Section 2.0, the Project activities will be similar to what is in the IS/MND but some details may vary based on final engineering and constructability review.

A portion of Segment 1 and two components of the Alternating Current (AC) Interference Mitigation System in the vicinity of intersection of Discovery Street and West San Marcos Boulevard (refer to *Mapbook*) are included within NTPR-3. This work is included in this NTP

request because it is subject to MM CUL-4 which states data recovery excavations must be completed before ground-disturbing construction activities can begin at the Project locations described in *Table 1* below. Data recovery excavations were completed on May 25, 2022 as described in *Attachment C, Post Data Recovery Summary Report.* Specifically, the following elements of the Project are included in this NTP request:

**Table 1: NTPR-3 Project Components**

| Project Component | Activity |
|---|---|
| Location 8 | Replace existing pole with pier foundation. Guard Structure 6 will be installed within the work area. |
| Location 11 | Replace existing pole with direct-bury foundation. Guard Structure 7 will be installed within the work area. |
| Location 12 | Replace existing pole with direct-bury foundation. |
| Coupon Test Station 2 | Install coupon test station |
| Deepwell 11 | Install deepwell and SSD |

## 2.0 Description of Activities for Project Components

SDG&E contractors will complete power line and AC Interference Mitigation System work activities as described below. Please note that the activities described below illustrate the more substantial activities to occur during construction but are not comprehensive of every activity that must be performed during construction, including those activities associated with construction mitigation and compliance.

Access Road Improvements

Equipment and vehicles will use existing public roadways (San Marcos Boulevard) shown on the *Mapbook* to reach the work sites. There are no new access roads or access road improvements proposed in this NTP request.

Overhead Power Line Construction and Removal (Locations 8, 11 and 12)

The steel power poles will be delivered in sections and assembled within the temporary work areas as shown in the *Mapbook*. A crane will be used to lift and install the poles. Location 8 will be installed on a concrete pier foundation and Locations 11 and 12 will be direct buried into auger holes. Aerial bucket trucks or similar equipment will be used to access structure arms to install attachments and perform wire installation work. Stringing equipment will be used to string conductor from structure to structure using controlled tension to keep the conductor elevated and away from obstacles. Helicopters are not anticipated for use during stringing activities. At Locations 8 and 11, guard structures will be installed temporarily to protect roadways and utility corridors (refer to the *Mapbook*).

Traffic control required for roadway crossings or pole installation activities would be performed in compliance with approved Traffic Control Plans provided by the City of San Marcos (see *Table 2* in Section 9.0 below). Existing pole components (e.g., poles, cross arms, hardware, conductor insulators) will be removed and properly recycled or disposed of in accordance with MM US-1 and applicable laws and regulations. Pole foundations will be removed to approximately two feet below final-grade and direct bury poles will be removed completely. If needed, poles may be cut at ground level, and the remainder of the pole will be left in place. The holes will be backfilled with clean fill, soils from the pole replacement, or clean decomposed granite.

Installation of Deepwell 11 and SSD

Deepwell 11 and its associated solid state decoupler (SSD) will be installed as part of the Project's AC Interference Mitigation System. As described in NTPR-2, the AC Interference Mitigation System design has changed slightly since the IS/MND was prepared and the PTC was issued. Specifically, the final AC Interference Mitigation System will include only five deepwells instead of the originally proposed 11 deepwells. Deepwell locations were also shifted slightly based on constructability reviews and the deepwell depths were increased to allow for fewer deepwells. The final Deepwell 11 is located approximately 130 west of the original Deepwell 10 location as included in the IS/MND and PTC. Deepwell 11 will be approximately 6 inches in diameter, though the upper 30 feet will be 8 inches in diameter to allow for a polyvinyl chloride (PVC) casing. Deepwell 11 will be approximately 200 feet deep. The deepwell will contain a copper grounding rod connected to a copper wire, in turn connecting the well to an SSD, and will be backfilled with conductive concrete. The wire will be laid in a trench up to 5 feet in depth to match pipeline depth. The trench will be excavated using a backhoe. Once the wire is connected to the pipe and SSD mechanism, the trench will be backfilled and returned to its original condition.

The SSD will be housed in a pedestal composed of fiberglass casing generally measuring 14 inches by 9 inches and 36 inches in height. Once installed, the base of the pedestal will be buried 8 to 12 inches below grade, leaving up to 28 inches exposed at ground surface. The pedestal will house the SSD mechanism, as well as the wires and cables connecting it to the deepwell and the pipeline. The pedestal will be locked for security purposes.

After identification of known utilities in the work area, the upper 10 feet will be excavated using a hydrovac system. This method will use high pressure water or air to dislodge compacted soil and vacuum the spoils to a storage receptacle. The rest of the deepwell will be excavated using a truck-mounted mud rotary drill. Cuttings will be removed by water circulating through the drill head. The cuttings and water will be directed to a desander, which will sort the solid materials out from the drilling slurry, which will be reused. In addition to lubricating the drill bit, the drilling slurry will serve to stabilize the wall of the well, maintain wall integrity, and impede the penetration of groundwater into the well.

Installation of Coupon Test Station 2

Coupon Test Station 2 will be installed to conduct periodic tests to monitor the functionality of the AC Interference Mitigation System. The test station will consist of a 2-inch PVC pipe fitted with a lockable lid and containing a plastic terminal board and wire leads to the pipe (existing pipeline) and coupon. A trench will be excavated to install the coupon near the pipe and place the wires

connecting it to the testing mechanism. Coupon Test Station 2 will be located below ground approximately 20 feet south of the subject pipeline, within an existing median (refer to the *NTP-3 Mapbook*). Once the connections are made, the trenches will be backfilled, and ground cover returned to its original condition.

## 3.0 Staging, Storage Yards and Laydown Areas

The NTPR-3 work areas will be used for laydown where pole components and materials may temporarily be situated for assembly. NTPR-3 work areas may also be used for installation of temporary construction components such as support structures and guy wires. The staging yards approved for use in NTP-1 will be utilized during NTPR-3 activities.

## 4.0 Location of Project Component

NTPR-3 work activities will take place within the City of San Marcos, California. Please refer to the *Mapbook*, to view the NTPR-3 components and work areas.

## 5.0 Estimated Area of Land Disturbance

The NTPR-3 work areas total approximately 0.01 acre of permanent disturbance and 0.34 acre of temporary disturbance. In accordance with the Construction General Permit (2009-0009-DWQ) effective soil cover such as hydromulch or another effective soil stabilization technique will be applied on disturbed, inactive areas in order to control erosion and fugitive dust in compliance with the Project's Stormwater Pollution Prevention Plan (SWPPP). Temporary work areas will be restored following completion of their use as close as possible to their original grade and landscape condition consistent with fire break requirements, or as otherwise agreed to with the property owner, local jurisdictional agency, and in accordance with the Project IS/MND and PTC.

## 6.0 Construction Schedule and Duration

Construction associated with NTPR-3 activities is anticipated to occur intermittently from July 2022 to November 2022 for a duration of approximately 5 months. Construction equipment operation is anticipated to take place during nighttime or early morning hours, as directed by the City of San Marcos. It is anticipated that approval to conduct work during these hours will be included with the forthcoming right-of-way (ROW) Permit and Traffic Control Plan from the City of San Marcos.

## 7.0 Construction Personnel

Approximately 5-10 construction personnel will typically be onsite at one time for the work included in NTPR-3. The peak number of construction personnel, including SDG&E management, engineering, and environmental compliance personnel onsite at one time for NTPR-3 activities will be approximately 15 personnel. Please see *Attachment B, MMRCP Requirements Tracking Table for NTPR-3* for further details on applicable monitoring requirements.

## 8.0 Preconstruction Requirements, Status and Mitigation Measures/Applicant Proposed Measures

During construction of the components described herein, SDG&E will implement all applicable APMs and Mitigation Measures (MMs) as identified in the Project's MMRCP. The applicability and status of all APMs and MMs included within the Project's MMRCP is provided in *Attachment B, MMRCP Requirements Tracking Table for NTPR-3*. The table is color coded for easy reference by applicability, timing, and the status (if the measure contains a preconstruction requirement and/or approval). The following pre-construction action will be completed prior to issuance of the NTPR-3:

- *MM CUL-4: Data Recovery Excavations*: Data recovery excavations have been carried out to collect scientifically consequential data associated with known resource P-37-032160 for Structures 8, 11, 12, Guard Structures 6 and 7, Deepwell 11 and Coupon Test Station 2. A Letter Report verifying the completion of data recovery excavations is included with this NTPR-3 submittal as *Attachment C*.

Prior to the start of NTPR-3 construction activities, SDG&E will communicate the environmental concerns and appropriate work practices to all SDG&E crews and contractors through Worker Environmental Awareness Program (WEAP) training. The WEAP will include, but is not limited to, a review of archaeological and paleontological resources, biological resources, hazardous waste and spill prevention, stormwater control, construction fire control and emergency response measures, and noise control measures.

## 9.0 Permits and Approvals

Construction activities included in NTPR-3 are anticipated to require the permits listed in *Table 2* below. SDG&E will obtain all necessary permits/approvals prior to initiating the specific Project activities triggering each requirement. In accordance with the Project MMRCP, all permits acquired by the Project will be submitted to the CPUC for their records prior to commencing the activity for which the permits and approvals were obtained.

**Table 2. NTPR-3 Potentially Required Permits**

| Agency | Permit | Applicability to Project Component | Ministerial / Discretionary |
|---|---|---|---|
| City of San Marcos | Transportation Permit | May be required for trucks exceeding the CVC legal load limits | Ministerial |
| | ROW Permit and Traffic Control | Permits will be acquired as necessary for work within the City ROWs | Ministerial |
| | Oversize Load Permit | May be required for transportation of oversize or overweight loads | Ministerial |
| State Water Resources Control Board | Construction General Permit Coverage (develop SWPPP) | NTPR-3 work areas will be covered by the Project SWPPP | N/A |

## 10.0 Request for Approval

SDG&E respectfully requests authorization of NTPR-3 to begin the work described herein as conditioned on any pending preconstruction requirements by July 08, 2022. Should you have any questions or need additional information, please do not hesitate to contact me at (760) 315-3288 or by email at MKimble1@sdge.com; or William (Bill) Yee at (619) 857-8922 or by email at WYee@sdge.com.

Sincerely,

Melinda A. Kimble
Project Manager
San Diego Gas & Electric Company

William R. Yee
Environmental Project Manager
San Diego Gas & Electric Company

Attachment A: NTPR-3 Mapbook
Attachment B: MMRCP Requirements Tracking Table For NTPR-3
Attachment C: Post Data Recovery Summary Report

cc: Dave Davis, Ecology and Environment, Inc.
Josh Taylor, KP Environmental

# ATTACHMENT A
# NTPR-3 Mapbook

# TL6975 SAN MARCOS to ESCONDIDO PROJECT

## NTPR-3 Mapbook

### San Diego County, CA


**LEGEND**

- State Highway
- Municipal Boundary

**Proposed Project**

- Replace existing with Pier Foundation
- Overhead Work
- Remove From Service
- Guard Structures
- Segment 1 - Rebuild
- Temporary Work Area
- Permanent Work Area or Grading Impacts
- Alignment in Franchise
- Existing ROW
- Approximate Additional ROW Required
- Stringing Site

0 10 20 30 40 50
Feet

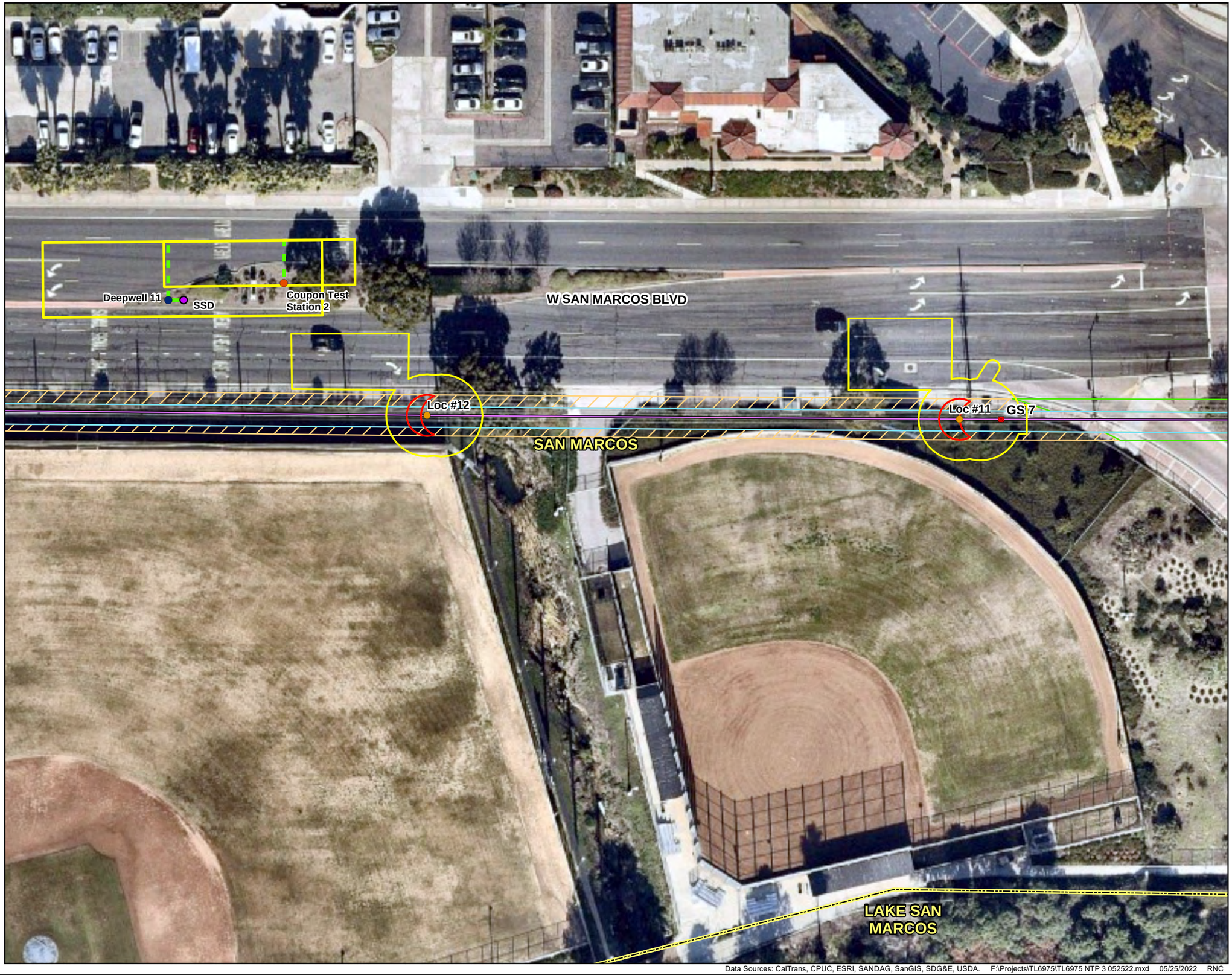
SDGE
A Sempra Energy utility


Data Sources: CalTrans, CPUC, ESRI, SANDAG, SanGIS, SDG&E, USDA. F:\Projects\TL6975\TL6975 NTP 3 052522.mxd 05/25/2022 RNC

# TL6975 SAN MARCOS to ESCONDIDO PROJECT

## NTPR-3 Mapbook

### San Diego County, CA




**LEGEND**

- State Highway
- Municipal Boundary

**Proposed Project**

- Replace Existing with Direct Bury
- Guard Structures
- Deepwell
- Coupon Test Station
- SSD
- Segment 1 - Rebuild
- Trench
- Temporary Work Area
- Permanent Work Area or Grading Impacts
- Alignment in Franchise
- Existing ROW
- Approximate Additional ROW Required

0 10 20 30 40 50
Feet


Data Sources: CalTrans, CPUC, ESRI, SANDAG, SanGIS, SDG&E, USDA. F:\Projects\TL6975\TL6975 NTP 3 052522.mxd 05/25/2022 RNC

# ATTACHMENT B
# MMRCP Requirements Tracking Table For NTPR-3

**ATTACHMENT B: MMRCP REQUIREMENTS TRACKING TABLE**

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| **BIOLOGICAL RESOURCES** | | | |
| **APM BIO-1:** SDG&E will conduct all construction and operation and maintenance activities in accordance with NCCP Operational Protocols to avoid and minimize impacts on biological resources. | Pre-construction, during Construction, and Operation | Not Applicable | None of the work areas associated with NTPR-3 are considered natural areas subject to the requirements of the NCCP. |
| **APM BIO-2:** All earth-moving equipment will be free of mud and vegetative material before being mobilized onto work areas associated with the Project. | During Construction | Applicable | APM BIO-2 will be implemented for NTPR-3 activities and earth-moving equipment will be inspected for cleanliness prior to mobilizing to work areas. |
| **APM BIO-3:** Except when not feasible due to physical or safety constraints, all Project construction vehicle movement will be restricted to the Project work areas, existing roads, and access roads constructed as a part of the Project and mapped by SDG&E in advance of construction. Approval from a biological monitor will be obtained prior to vehicle travel off of existing access roads. | During Construction | Applicable | SDG&E will implement APM BIO-3 during NTPR-3 construction. No vehicle travel off of existing roads is anticipating to be required as part of NTPR-3 activities. |
| **APM BIO-4:** Civil and land survey personnel will keep survey vehicles on existing roads. During Project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel point placement in sensitive habitat prior approval will be required from the Project's biological monitor. Hiking off roads or paths for survey data collection will be allowed year-round as long as all of the other applicable APMs are met. | Pre-construction and during Construction | Applicable | Any survey activities required as part of NTPR-3 will adhere to APM BIO-4, although there is no off-road data collection anticipated to be required. |
| **APM BIO-5:** Prior to the start of construction, the boundaries of sensitive plant populations that require protection will be delineated with clearly visible flagging or fencing by a qualified biologist. The flagging and/or fencing will be maintained in place for the duration of construction. Flagged and fenced areas will be avoided to the extent practicable during construction activities in that area. If impacts on sensitive plant species are unavoidable, SDG&E will perform soil and plant salvage activities to enhance recovery of these special-status plants, consistent with the provisions in the Enhancement Section 7.2.1 of the NCCP. These include the stockpiling of native soil in the area where Nuttall's scrub oak and wart-stemmed Ceanothus occur and top soil replacement after construction. Quality assurances and success criteria milestones for | Pre-construction and during Construction | Not Applicable | There are no sensitive plant populations that require protection within the NTPR-3 work areas. |

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| the restoration area as a whole will conform to the standards provided in Enhancement Section 7.2.1 of the NCCP. | | | |
| **APM BIO-6: *Coastal California Gnatcatcher.*** Prior to construction, SDG&E shall retain a qualified biologist to conduct surveys for the coastal California gnatcatcher in suitable habitat, to determine if any active nests are within or in the immediate vicinity of proposed construction activities. If feasible, SDG&E will avoid construction during the peak breeding season (February 15 – August 31) for coastal California gnatcatcher and migratory birds. When it is not feasible to avoid trimming or removal of vegetation or during the peak breeding season, SDG&E will perform a site survey in the area where the work is to occur. Trimming or removal of vegetation during the peak breeding season will require a preconstruction survey by a qualified biologist to confirm that active nests will not be affected. This survey will be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest. If the nesting and/or breeding activities are being conducted by a federal or state-listed species, SDG&E will consult with the USFWS and CDFW as necessary. Monitoring of the nest will continue until the birds have fledged or construction is no longer occurring on site.<br>**Migratory Birds.** Trimming or removal of vegetation during the peak breeding season (February 15 to August 31) will require a pre-construction survey by a qualified biologist to confirm that active nests will not be affected. If an active nest is detected within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest. | Pre-construction and during Construction | Not Applicable | There is no suitable habitat for coastal California gnatcatcher in the vicinity of NTPR-3 work areas. |
| **APM BIO-7:** If a raptor nest is observed during preconstruction surveys, a qualified biologist would determine if it is active. If the nest is determined to be active, the biological monitor would monitor the nest to ensure nesting activities and/or breeding activities are not substantially adversely affected. If the biological monitor determines that Project activities are disturbing or disrupting nesting and/or breeding activities, the monitor will make recommendations to reduce the noise and/or disturbance in the vicinity of the nest. | Pre-construction and during Construction | Applicable | APM BIO-7 will be implemented for NTPR-3 activities. |

**ATTACHMENT B: MMRCP REQUIREMENTS TRACKING TABLE**

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| **APM BIO-8:** A biological monitor will be present during all ground-disturbing and vegetation removal activities. Immediately prior to initial ground-disturbing activities and/or vegetation removal, the biological monitor will survey the site to ensure that no special-status species will be impacted. | Pre-construction and during Construction | Applicable | APM BIO-8 will be implemented for NTPR-3 activities, as applicable. However, NTPR-3 activities are not anticipated to require biological resources monitoring. |
| **APM BIO-9:** Wherever possible, vegetation will be left in place or mowed, instead of grubbed, to avoid excessive root damage and to allow for regrowth and to minimize soil erosion. | Pre-construction and during Construction | Applicable | APM BIO-9 will be implemented for NTPR-3 activities. |
| **Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts.** Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA).<br><br>If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies. | Pre-construction | Not Applicable | **Complete.** SDG&E has provided written mitigation commitment with proof of sufficient mitigation/take credits to the CPUC as part of the NTPR-1 package on March 3, 2021. However, none of the work areas associated with NTPR-3 are considered natural areas subject to the requirements of the NCCP. |

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| **Mitigation Measure BIO-2: Establishment of Cylindrical Construction Buffers.** The biological monitor shall establish a three-dimensional cylinder-shaped buffer around active nests that have the potential to be affected by helicopter use or ground-based activities associated with helicopter use. A vertical buffer shall extend at least 300 feet vertically above the location of the nest and at least 300 feet horizontally for passerines (or 500 feet vertically and horizontally for raptors and 500 feet vertically and 0.5 mile horizontally for white-tailed kite). The biological monitor and SDG&E project manager shall monitor the helicopter tracks (i.e., flight patterns, durations) daily to ensure compliance with these established buffers. This buffer assumes the helicopter activities are temporary or infrequent in nature (no longer than one minute [e.g., pass-by] or visit the site once in a day) If helicopter work occurs in the vicinity of an active nest for an extended period of time, the biological monitor may determine, based on the nature of the work and nest monitoring observations, that the buffer is insufficient for the nest and adjust the buffer distance appropriately. | During Construction | Not Applicable | There are no helicopter activities anticipated to be required as part of NTPR-3 activities. |
| **Mitigation Measure BIO-3: Avoid Jurisdictional Resources.** To avoid impacts on jurisdictional areas, SDG&E and its contractor shall flag work area limits and work shall be restricted to the flagged limits. Additionally, when clearing or grading occurs within 25 feet of a jurisdictional feature, silt fencing shall be installed on the side of the work area closest to the jurisdictional feature, to minimize construction-generated run-off or sedimentation. A qualified biologist shall verify that silt fencing and construction work is properly installed and are located outside of jurisdictional areas to confirm their avoidance. Monitoring shall take place during rain events to confirm the integrity of silt fencing and verify runoff does not enter jurisdictional areas. | Pre-construction and during Construction | Applicable | A Qualified Biologist will verify that work limits are flagged as necessary, and silt fencing is installed properly and maintained if required in accordance with Mitigation Measure BIO-3. |
| **CULTURAL RESOURCES** | | | |
| **Mitigation Measure CUL-1: Retention of Qualified Archaeologist.** Prior to the start of any ground disturbing activity, a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior, 2008) shall be retained by SDG&E. The Qualified Archaeologist, or a CPUC-approved archaeological monitor overseen by the Qualified Archaeologist, shall carry out all APMs and mitigation measures related to archaeological resources. | Pre-construction, during Construction and Restoration | Applicable | **Complete/Ongoing.** A CPUC-approved Qualified Archaeologist and/or Archaeological Monitor shall implement all APMs and cultural resource mitigation measures for NTPR-3 activities. SDG&E identified the proposed Qualified Archaeologist in the CRMP, which was submitted to the CPUC on January 21, 2021 and approved in July 2021. |
| **Mitigation Measure CUL-2: Pre-Construction Cultural Resources Sensitivity Training.** Prior to the start of any ground-disturbing activity, the Qualified Archaeologist | Pre-construction | Applicable | **Complete/Ongoing**. A Worker Environmental Awareness Program |

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| shall prepare cultural resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The cultural resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the Qualified Archaeologist. The Qualified Archaeologist shall determine and ensure the suitability of the qualified environmental trainer. The cultural resources sensitivity training shall be conducted for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be implemented in the event of an inadvertent discovery of archaeological resources or human remains. SDG&E shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. | and during Construction | | (WEAP) was developed in coordination with the Qualified Archaeologist to include cultural resources sensitivity training. WEAP training will be ongoing throughout the life of the Project, and WEAP sign-in sheets will be kept as part of the Project record. |
| **Mitigation Measure CUL-3: Development and Implementation of Cultural Resources Monitoring Plan.** Prior to the start of any Project-related ground disturbing activities the Qualified Archaeologist shall prepare a Cultural Resources Monitoring Plan (CRMP). The CRMP shall stipulate the location and timing of archaeological and Native American monitoring, including, but not limited to, the monitoring of all ground disturbing activities within 250 feet of P-37-032160 and within 100 feet of the remaining 10 archaeological resources (P-37-004495, -004499, -005501, -007306, -010551, -010550,-011442, -012209, -034831, and TL6975-S-5) that have the potential to contain or are known to contain subsurface archaeological deposits, as well as all ground disturbing activities within Segment 3 and the easternmost 500 feet of Segment 2. The CRMP shall include monitoring protocols to be carried out during Project construction. The CRMP shall stipulate that a Native American monitor associated with one or more of the Native American groups that have expressed interest in the Project (i.e., San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the Iipay Nation) be retained to monitor all Project-related ground disturbance stipulated in the CRMP. In preparing the CRMP, the Native American groups that have expressed interest in monitoring shall be consulted regarding the scheduling of monitors. A Native American monitoring schedule shall be incorporated into the CRMP.<br><br>The CRMP shall contain an allowance that the Qualified Archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and SDG&E, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural resources | Pre-construction and during Construction | Applicable | **Complete.** The Final CRMP was approved by the CPUC in July 2021. |

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| during Project implementation, including that all ground disturbance within 100 feet of an unanticipated discovery shall cease until a treatment plan is developed by the Qualified Archaeologist in coordination with SDG&E and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the Project if avoidance of a significant resource is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to PRC Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan shall also include reporting of monitoring results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories. The CRMP shall be submitted to SDG&E and CPUC for review and approval prior to the start of Project-related ground disturbance, as well as to the Native American groups that have expressed interest in the Project (i.e. San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the Iipay Nation) for review and comment. | | | |
| **Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160.** Prior to the start of any Project-related ground disturbing activities within 250 feet of archaeological site P-37-032160, data recovery excavations shall be carried out to collect scientifically consequential data associated with known resource P-37-032160 where Project-related ground disturbing activities including but not limited to pole replacement, trenching, potholing, and AC mitigation well and test station installations will be carried out. Prior to the start of the data recovery excavations, a research design shall be prepared by the Qualified Archaeologist outlining the research questions to be addressed as part of the data recovery, as well as the field and lab methods and any special studies proposed to obtain the scientifically consequential information. The research design shall be submitted to SDG&E and CPUC for review and approval prior to the start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians and the Rincon Band of Luiseno Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&E, and submitted to the San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians for review and comment. The final data recovery report shall be placed on file at the South Coast Information Center. | Pre-construction and during Construction | Applicable | **Complete/Ongoing** SDG&E submitted the research design to the CPUC for on February 18, 2021 and was approved in December, 2021. A Post Data Recovery Summary Report is included as an attachment to this NTP request summarizing the data recovery efforts and confirming completion of the data recovery excavations, which concluded on May 25, 2022.<br><br>The Data Recovery Report described in MM CUL-4 will be drafted and submitted to the CPUC, the San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians for review and comment. The final Data Recovery Report shall be placed on |

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| | | | file at the South Coast Information Center. |
| **Mitigation Measure CUL-5: Exclusionary Fencing.** Prior to Project-related ground disturbing activities, exclusionary fencing shall be installed to ensure that the five previously recorded archaeological sites within or immediately adjacent to the Project alignment that have surface manifestations (P-37-004495, -004499, -007306, -012209, and TL6975-S-5) are not inadvertently impacted during Project implementation. The exclusionary fencing shall encompass the mapped site boundaries plus a 25-foot radius to ensure an appropriate buffer is maintained between the sites and Project-related ground disturbing activities. For the four archaeological resources bisected by Project access roads (P-37-004495, -004499, -007306, and TL6975-S-5), the exclusionary fencing shall be established along the shoulder of the existing roads. To ensure avoidance, the exclusionary fencing shall be marked with signs indicating that staff associated with the Project are not to go beyond the limits of the fencing. The exclusionary fencing shall not identify the protected areas as demarcating archaeological resources in order to discourage unauthorized disturbance, vandalism, or collection of artifacts. | Pre-construction and during Construction | Not Applicable | Mitigation Measure CUL-5 is not applicable to NTPR-3. The NTPR-3 activities are not located in proximity to the sites listed in MM CUL-5. |
| **Mitigation Measure CUL-6: Pre-Construction Surveys.** Prior to the start of Project-related ground disturbing activities, pre-construction surveys of the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5) shall be conducted to map and collect all artifacts located within the road beds. Artifact mapping shall be conducted using a hand held GPS unit capable of sub-meter accuracy, and the final disposition of the artifacts shall be determined by SDG&E in coordination with the San Luis Rey Band of Mission Indians. | Pre-construction and during Construction | Not Applicable | MM CUL-6 is not applicable to NTPR-3. Access for all NTPR-3 activities will be from existing paved city streets. |
| **Mitigation Measure CUL-7: Road Maintenance within Archaeological Sites.** During Project implementation, routine road maintenance, including but not limited to grading and blading, shall be avoided within the four archaeological sites bisected by existing access roads (P-37-004495, - 004499, -007306, and TL6975-S-5). Should maintenance activities such as drainage or culvert repairs be required to stabilize the access road, all ground disturbing activities within 100 feet of the four archaeological sites shall be monitored as stipulated in the CRMP. | During Construction | Not Applicable | Mitigation Measure CUL-7 is not applicable to NTPR-3. Access for all NTPR-3 activities will be from existing paved city streets and not access roads. |
| **Mitigation Measure CUL-8: Inadvertent Discovery of Human Remains.** If human remains are uncovered during Project construction, all work within 100 feet of the find shall be immediately halted, and the San Diego County coroner shall be contacted to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the County Coroner determines that the | During Construction | Applicable | Mitigation Measure CUL-8 will be implemented by SDG&E in the event human remains are discovered during NTPR-3 activities. |

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| remains are Native American, the County Coroner shall contact the California Native America Heritage Commission (NAHC), in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The NAHC shall then identify a Most Likely Descendant (MLD) of the deceased Native American, who shall then help determine what course of action should be taken in the disposition of the remains.<br><br>Per Public Resources Code Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. | | | |
| **GEOLOGY, SOILS, SEISMICITY, AND PALEONTOLOGICAL RESOURCES** | | | |
| **Mitigation Measure GEO-1: Geotechnical Report.** The structural requirements of the California Building Code (CBC) are applicable to certain structural components of the Project, including retaining walls, screen walls, fences, and control shelters. SDG&E and/or its contractors shall design such structures to comply with such CBC standards and shall adhere to and implement all design recommendations and parameters established in the Project's Geotechnical Investigation Report by GEOCON Inc. and the AC Interference Analysis & Mitigation System Design by ARK Engineering & Technical Services. In addition, SDG&E shall retain a California registered professional engineer(s) to prepare a supplemental geotechnical report. This report shall address specific geotechnical hazards that were not addressed in the Geotechnical Investigation Report, and provide recommendations for mitigating such hazards. The analysis in that report shall include, but not be limited to, the following:<br><br>-recommendations to address the liquefaction risk within the Quaternary alluvium along Segment 1 and 3, if any;<br>-recommendations to address the corrosive soils that are present along Segments 1 and 2, if any, which pose a risk to the concrete pier foundations and direct bury poles;<br>-recommendations to address the landslide potential along Segment 2, if any, where planned ground disturbing activities could trigger landslides; and,<br>-evaluation of the site-specific conditions and recommendations specific to micropiles where proposed, if final design includes the use of micropiles.<br>The recommendations shall ensure that when incorporated, the Project shall not | Pre-construction and during Construction | Applicable | **Complete.** The supplemental geotechnical report was approved by the CPUC Project Manager on May 18, 2021. |

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| increase the potential for ground failure, slope instability, and/or landslides, and shall be resistant to damage from ground shaking, ground failure, corrosive soils, unstable slopes, and landslides. SDG&E shall submit the supplemental geotechnical report to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction. | | | |
| **Mitigation Measure PALEO-1: Project Paleontologist.** SDG&E or its contractor shall retain a qualified professional paleontologist (qualified paleontologist) meeting the Society of Vertebrate Paleontology (SVP) standards as set forth in the "Definitions" section of Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) prior to the approval of demolition or grading permits. The qualified paleontologist shall attend the Project kick-off meeting and Project progress meetings on a regular basis, shall report to the site in the event potential paleontological resources are encountered, and shall implement the duties outlined in Mitigation Measures PALEO-2 through PALEO-4. | Pre-construction and during Construction | Applicable | **Complete/Ongoing**. A Qualified Paleontologist has been retained. The Qualified Paleontologist shall implement all paleontological resource mitigation measures for NTPR-3 activities. |
| **Mitigation Measure PALEO-2: Worker Training.** Prior to the start of any ground disturbing activity (including vegetation removal, pavement removal, etc.), the qualified paleontologist shall prepare paleontological resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The paleontological resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the qualified paleontologist. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project site and the procedures to be followed if they are found, as outlined in the approved Paleontological Resources Monitoring and Mitigation Plan in Mitigation Measure PALEO-3. SDG&E and/or its contractor shall retain documentation demonstrating that all construction personnel attended the training prior to the start of work on the site, and shall provide the documentation to the CPUC Project Manager upon request. | Pre-construction and during Construction | Applicable | **Complete/Ongoing.** A WEAP was developed in coordination with the Qualified Paleontologist to include paleontological resources sensitivity training. WEAP training will be ongoing throughout the life of the Project, and WEAP sign-in sheets will be kept as part of the Project record. |
| **Mitigation Measure PALEO-3: Paleontological Monitoring.** The qualified paleontologist shall prepare, and SDG&E and/or its contractors shall implement, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). SDG&E shall | | Applicable | **Complete.** The PRMMP was approved by the CPUC on July 27, 2021. |

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| submit the plan to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction. This plan shall address specifics of monitoring and mitigation and comply with the recommendations of the SVP (2010), as follows.<br><br>· The qualified paleontologist shall identify, and SDG&E or it contractor(s) shall retain, qualified paleontological resource monitors (qualified monitors) meeting the SVP standards (2010).<br>· The qualified paleontologist and/or the qualified monitors under the direction of the qualified paleontologist shall conduct full-time paleontological resources monitoring for all ground-disturbing activities in previously undisturbed sediments in the Project site that have high paleontological sensitivity. This includes any depth of excavation into the Santiago Formation, as well as excavations that exceed 10 feet in depth in areas mapped as young alluvial floodplain deposits that overlie the Santiago Formation. The PRMMP shall clearly map these portions of the Project based on final design provided by SDG&E and/or its contractor(s).<br>· If many pieces of heavy equipment are in use simultaneously but at diverse locations, each location will need to be individually monitored.<br>· Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to evaluate and recover the fossil specimens, establishing a 50-foot buffer.<br>· If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location and regardless of whether the site is being monitored, work at the discovery location shall cease in a 50-foot radius of the discovery until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment.<br>· The qualified paleontologist shall determine the significance of any fossils discovered, and shall determine the appropriate treatment for significant fossils in accordance with the SVP standards. The qualified paleontologist shall inform SDG&E of these determinations as soon as practicable. See Mitigation Measure PALEO-4 regarding significant fossil treatment.<br>· Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort and any curation of fossils. SDG&E shall provide the daily logs to the CPUC Project Manager upon request, and shall provide the final report to the CPUC Project Manager upon completion. | | | |
| **Mitigation Measure PALEO-4: Significant Fossil Treatment.** If any find is deemed significant, as defined in the SVP standards (2010) and following the process outlined | During Construction | Applicable/ As Needed | Mitigation Measure PALEO-4 will be implemented if any paleontological |

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| in Mitigation Measure PALEO-3, the qualified paleontologist shall salvage and prepare the fossil for permanent curation with a certified repository with retrievable storage following the SVP standards. | | | finds are deemed significant as part of NTPR-3 activities. |
| **HAZARDS AND HAZARDOUS MATERIALS** | | | |
| **APM HAZ-1:** A Health and Safety Plan will be prepared and implemented during construction. The Health and Safety Plan will describe the anticipated hazards that construction workers may encounter while working on the Project, the safety measures that must be taken to address those hazards, and the necessary training requirements for personnel working on the Project. Safety hazards and applicable federal and state occupational standards will be identified in conjunction with the development of appropriate response actions, as well as a protocol for accident reporting. The Health and Safety Plan will also identify security and safety requirements for staging areas, storage yards, excavation areas, and any other areas of the Project where hazards may exist during construction activities. In addition, information regarding medical kits, safety equipment, and evacuation procedures will be outlined in the Health and Safety Plan. A qualified safety field representative will be present on site to observe and document adherence to the Health and Safety Plan as needed. The Health and Safety Plan will be prepared by the SDG&E construction contractor and will be available immediately prior to construction. | Pre-construction | Applicable | **Complete.** The Health and Safety Plan was submitted to the CPUC on December 6, 2020, and will be adhered to during NTPR-3 activities. |
| **APMs TRA-1** and **TRA-2**, described below. | Pre-construction and during Construction | Applicable | APMs TRA-1 and TRA-2 will be implemented as necessary by SDG&E during NTPR-3 activities. |
| **Mitigation Measure HAZ-1: Soil and Dewatering Management Plan.** SDG&E and the contractor conducting soil excavation and (if needed) dewatering shall develop and implement a Soil and Dewatering Management Plan (SDMP) that describes the procedures for managing excavated soil and groundwater generated from dewatering activities. The SDMP shall include procedures for monitoring soil for possible contamination, identifying the specific stockpiling locations and measures to contain the stockpiled soil to prevent run on and run off, and materials disposal specifying how the construction contractor(s) will remove, handle, transport, and dispose of all excavated materials in a safe, appropriate, and lawful manner. The SDMP shall specify the contractor will segregate and dispose of soil with chemical concentrations above regulatory standards. Soil with chemical concentrations below regulatory standards may be reused or recycled. Soil with chemical concentrations above regulatory | Pre-construction and during Construction | Applicable | **Complete.** The Soil and Dewatering Management Plan was submitted to the CPUC for review and approval on January 22, 2021. The Plan was approved by the CPUC on February 18, 2021. |

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| standards shall be disposed of in accordance with the applicable provisions of Cal. Code Regs. Title 22, Chapter 11, Article 3, Section 66261 (i.e., Class III (non-hazardous waste), Class II (non-hazardous and "designated" waste), or Class I (non-hazardous and hazardous waste)). The SDMP must identify protocols for soil testing and disposal, identify the approved disposal sites, and include written documentation that the disposal site can accept the waste. The contractor shall include procedures for the safe and legal disposal of groundwater generated from dewatering, if any. The procedures shall include water sampling and testing procedures to quantify chemical concentrations in the water, and dispose of the water in a safe and legal manner. Note that the disposal of groundwater generated from dewatering may be disposed of under the State's VOC and Fuel General Permit, depending on chemical concentrations and local sanitary sewer acceptance criteria. Contract specifications shall mandate full compliance with all applicable local, State, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in soil and groundwater. This SDMP shall be submitted to CPUC for review and approval prior to commencement of construction. | | | |
| **HYDROLOGY AND WATER QUALITY** | | | |
| **Mitigation Measure HAZ-1: Soil and Dewatering Management Plan**, described above. | Pre-construction and during Construction | Applicable | **Complete.** The Soil and Dewatering Management Plan was submitted to the CPUC for review and approval on January 22, 2021. The Plan was approved by the CPUC on February 18, 2021. |
| **NOISE** | | | |
| **APM NOI-1:** Construction activities will occur during the times established by the local ordinances, with the exception of certain activities where nighttime and weekend construction activities are necessary, including, but not limited to, construction work timeframes mandated by permit, pouring of foundations, and pulling of the conductor, which require continuous operation or must be conducted during off-peak hours per agency requirements. SDG&E will meet and confer with the applicable jurisdiction to discuss temporarily deviating from the requirements of the noise ordinance, as described in the noise variance process. | Pre-construction and during Construction | Applicable | Night and weekend work may be required by the forthcoming City of San Marcos Right-Of-Way (ROW) Permit and Traffic Control Plans which apply to NTPR-3 activities. If needed, SDG&E will meet and confer with the City to discuss temporarily deviating from the requirements of the noise ordinance as required by APM NOI-1. |

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| **APM NOI-2:** SDG&E will provide notice of the construction plans to all property owners within 300 feet of the Project by mail at least one week prior to the start of construction activities. The announcement will state the anticipated construction start window, anticipated completion window, and hours of operation, as well as provide a telephone contact number for receiving questions or complaints during construction. SDG&E will maintain functional mufflers and/or silencers on all equipment to minimize noise levels as well as evaluate the potential use of portable noise barriers. | Pre-construction and during Construction | Applicable | **Complete.** Pre-construction notifications were sent out to property owners within 300 feet of the Project including NTPR-3 work areas. |
| **Mitigation Measure NOI-1: Construction Noise Reduction and Mitigation Plan.** To reduce noise impacts due to Project construction near sensitive receptors, SDG&E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan). The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval. The Plan shall include a requirement for SDG&E to administer a noise monitoring program when construction activities are conducted within 100 feet of sensitive receptor locations to ensure that the provisions of the Plan, including those identified below, are effective in reducing construction noise levels at sensitive receptor locations to 75 dBA $L_{eq}$ or less. The Plan shall present specific measures that identify how the construction noise limit of 75 dBA as an hourly $L_{eq}$ at nearby sensitive receptor locations will be adhered to, how potential exceedances will be documented and corrected, and how impacts on sensitive receptors from exceedances that cannot be corrected or avoided will be mitigated, including but not limited to the following measures:<br><br>***Noise Reduction***<br>The following measures shall apply to construction activities within 100 feet of sensitive receptor locations:<br><br>• Impact tools (e.g., jack hammers, pavement breakers, and rock drills) shall be hydraulically or electrically powered where feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dB. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dB. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible.<br>• When construction activities that could potentially exceed 75 dBA are conducted, construction equipment and trucks shall be equipped with enhanced noise control measures (where feasible and reasonably available). Enhanced noise control measures shall be identified in the Plan and could include, but are not limited to, | Pre-construction and during Construction | Applicable | **Complete.** The Construction Noise Reduction and Mitigation Plan (CNRMP) was approved by the CPUC on September 1, 2021. The CNRMP will be implemented for NTPR-3 activities. NTPR-3 work areas are not located within 100 feet of sensitive receptors. |

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| improved exhaust mufflers and intake silencers, engine enclosures, noise shields or shrouds, etc.<br>□ When construction activities that could potentially exceed 75 dBA are conducted, noise barriers such as noise shields, barriers, blankets, or enclosures shall be used, where feasible, adjacent to or around noisy construction equipment. Noise control shields/barriers/blankets shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise shield/barrier/blanket. The noise barrier must be installed in a location that completely blocks line-of-sight between the construction noise source (e.g., generator, backhoe) and sensitive receptors located within 100 feet of the noise source.<br>□ Stationary construction noise sources shall be located as far from adjacent receptors as possible. They shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent this does not interfere with construction.<br><br>***Notification and Correction***<br><br>□ Distribute to the potentially affected residences within 100 feet of Project construction an informational pamphlet, and post signs at conspicuous publicly accessible places at each construction site, that indicate the hours of construction work and applicable noise level limits and provide a "hotline" telephone number, which shall be attended during active construction working hours and record messages outside of working hours, for use by the public to register complaints. SDG&E shall identify whether posted hours and/or the 75 dBA $L_{eq}$ threshold have been exceeded, take action to keep to posted hours and/or reduce noise levels below 75 dBA, and notify CPUC within 24 hours. With regard to any noise complaints received citing project construction, SDG&E shall ensure that all complaints received during or outside of working hours shall be logged noting date, time, complainant's name, nature of complaint, and any corrective action taken, and shall submit such information to the CPUC Project Manager within 48 hours of receiving the complaint.<br>□ For construction activities that involve a helicopter (e.g., sock line installation, movement of materials), at least one week prior to the start of such activity, additional notice shall be issued or delivered [by a means which provides proof of delivery] by SDG&E and/or its contractor to sensitive receptors within 300 feet of planned helicopter activity. This notice shall include the estimated date and time of the proposed work, as well as the estimated duration of the work, both in terms of overall duration per segment and duration per pole location.<br><br>***Relocation*** | | | |

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| □ The Plan shall provide for temporary relocation of residents in the event that the Plan or the noise monitoring program identifies the potential for construction noise to exceed 75 dBA Leq within 100 feet of such receptors. | | | |
| **Mitigation Measure NOI-2: Blasting Plan.** Prior to conducting any blasting activities, SDG&E shall develop a Blasting Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor. The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval to ensure that all components of this measure have been included and all required reviews, signatures, and permits obtained. The plan shall include a current/valid copy of the Explosives Permit issued by the San Diego County Sheriff's Office, as well as documentation that all local blasting requirements have been adhered to. The Blasting Plan shall include at a minimum the following measures:<br><br>□ Methods of matting or covering of blast area to prevent excessive air blast pressure.<br>□ Description of air blast monitoring program.<br>□ If necessary, SDG&E and/or its contractors shall use portable noise barriers between the source and affected occupied properties to reduce excessive noise impacts.<br>□ Blasting shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. daily.<br>□ Blasting notification procedures, lead times, and list of those notified. Public notification to potentially affected sensitive receptors describing the expected extent and duration of the blasting.<br>□ Verification that explosives are not being proposed for use within 300 feet of the boundary of any occupied parcels zoned for residential. In the event that blasting activities are proposed within this distance, SDG&E will provide verification to the CPUC that residences affected by noise are notified of the date and time of blasting and offered temporary relocation assistance. | Pre-construction and during Construction | Not Applicable | No blasting is anticipated to be required as part of NTPR-3 activities. |

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| **Mitigation Measure NOI-3: Vibration Reduction Plan.** Prior to any blasting construction, the applicant shall develop a Vibration Reduction Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor, and submit the Plan to the CPUC for approval at least 14 days prior to any proposed blasting. The Vibration Reduction Plan shall include vibration reduction measures to ensure that surrounding buildings will be exposed to less than 0.2 PPV to prevent building damage. At a minimum, the plan shall consider the following measures:<br><br>• Evidence of licensing, experience, and qualifications of blasting contractors.<br>• The Plan shall establish a vibration limit of 0.2 PPV at nearby structures in order to protect structures from blasting activities and identify specific locations for monitoring. A pre-blast survey shall be conducted of any potentially affected structures.<br>• The Plan shall identify the appropriate size of the explosive charge to ensure that a vibration level of 0.2 PPV is not exceeded at nearby structures.<br>• Impacted property owners shall be notified at least 48 hours prior to the visual inspections.<br>• Post-construction inspection of structures shall be performed to identify (and repair if necessary) any damage from blasting vibrations. Any damage shall be documented by photograph, video, etc. This documentation shall be reviewed with the individual property owners and SDG&E shall arrange and fund any needed repairs. Documentation of these efforts shall be provided to the CPUC. | Pre-construction and during Construction | Not Applicable | No blasting is anticipated to be required as part of NTPR-3 activities |
| **PUBLIC SERVICES** | | | |
| **Mitigation Measure WIL-1: Fire Safety,** described in *Wildfire* below. | Pre-construction and during Construction | Applicable | NTPR-3 construction activities will take place in accordance with Mitigation Measure WIL-1. |
| **RECREATION** | | | |
| **APM PS-1:** SDG&E will provide the public with advance notification of construction activities. Concerns related to dust, noise, and access restrictions with construction activities will be addressed within this notification. | Pre-construction and during Construction | Not Applicable | NTPR-3 activities are not anticipated to affect any recreational facilities or activities. General pre-construction notices were sent to property owners within 300 feet of the Project in compliance with MM NOI-1. |

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| **APM PS-2:** All construction activities will be coordinated with the property owner or authorized agent for each affected park, trail, or recreational facility prior to construction in these areas. | Pre-construction and during Construction | Not Applicable | NTPR-3 construction activities will not affect any park, trail, or recreational facility. |
| **APM PS-3:** As needed, signs will be posted directing vehicles to alternative park access and parking, if available, in the event construction temporarily affects parking near trailheads. | Pre-construction and during Construction | Not Applicable | NTPR-3 construction activities will not affect any park, trail, or recreational facility. |
| **APM PS-4:** All parks, trails, and recreational facilities that are physically impacted during construction activities and are not directly associated with the new permanent facilities, will be returned to an approximate pre-construction state, while still allowing for SDG&E to safely operate and maintain the facilities, following the completion of the Project. SDG&E will replace or repair any damaged or removed public equipment, facilities, and infrastructure in a timely manner. | During Construction and Restoration | Not Applicable | NTPR-3 construction activities will not affect any park, trail, or recreational facility. |
| **TRANSPORTATION AND TRAFFIC** | | | |
| **APM TRA-1:** If construction requires lane closures, traffic delays, or other encroachment of construction activities within public travelways, the Applicant will adhere to local traffic control regulations and establish a traffic control plan as needed to comply with local ordinances. Traffic control plans will describe signage, flaggers, or other controls to be used to regulate traffic where necessary and to maintain a safe transportation corridor during construction. | During Construction | Applicable | SDG&E will comply with all permits and traffic control plans for NTPR-3 activities. |
| **APM TRA-2:** The Applicant will coordinate with local emergency response agencies during construction within existing public roadways to allow safe passage and access by emergency vehicles and equipment. | During Construction | Applicable | SDG&E will coordinate with local emergency response agencies throughout NTPR-3 construction within existing public roadways. |
| **Mitigation Measure TRA-1:** Coordination with North County Transit District (NCTD**).** SDG&E and its contractor shall:<br><br>□ Minimize interruptions to transit services and facilities. In the event that a temporary removal or relocation of a bus stop is necessary, coordination with NCTD shall occur to ensure that any such action is consistent with the transit operator's | During Construction and Restoration | Not Applicable | NTPR-3 activities are not anticipated to impact NCTD bus stops. |

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| needs.<br>  The applicant shall coordinate with NCTD at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services' operations. | | | |
| **UTILITIES AND SERVICE SYSTEMS** | | | |
| **Mitigation Measure US-1: Construction and Demolition Debris Recycling Ordinances.** SDG&E and its contractors shall recycle and/or reuse 90 percent of inert materials and 70 percent of all other materials, as well as 100 percent of trees, stumps, rocks, and other vegetation. In order to document and track such diversions, the applicant shall provide the following:<br><br>  Prior to construction, the Applicant shall provide a preliminary Construction and Demolition Debris Register (Preliminary Debris Register) that lists all anticipated construction and demolition solid waste streams (by weight) along with how the project will dispose/divert each waste. The Preliminary Debris Register shall also list the anticipated destination(s) (i.e., location or facility) for each waste stream. The Preliminary Register shall document how the project shall achieve the minimum waste diversion percentages.<br>  During construction activities, the Applicant shall keep records (e.g., a log) on site documenting the disposal and/or diversion of all construction and demolition debris that leaves the project site. The Applicant shall also keep copies of all corresponding receipts or similar documentation from solid waste facility, recycling center, green waste facility, or other permitted facility.<br>  During construction activities, the Applicant shall provide updates for solid waste diversion to the CPUC as part of the Quarterly Project Status Reports required by the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP).<br>  Following the completion of construction activities, the Applicant shall provide a Final Debris Register that documents the final construction and demolition debris totals, destinations, and diversion percentages. The Final Debris Register shall document the Project's final compliance with the minimum diversion percentages. | During Construction | Applicable | **Complete/Ongoing.** SDG&E provided the preliminary Construction and Demolition Debris Register (Register) to the CPUC as part of the NTPR-1 package and submitted an Updated Construction and Demolition Debris Register on February 22, 2022.<br><br>SDG&E will implement Mitigation Measure US-1 during all applicable NTPR-3 construction activities. SDG&E shall provide updates for solid waste diversion to the CPUC as part of the Quarterly Project Status Reports. |
| **WILDFIRE** | | | |
| **Mitigation Measure WIL-1: Fire Safety.** SDG&E and/or its contractors shall prepare and implement a Final Project-specific Construction Fire Prevention Plan (CFPP) to ensure the health and safety of construction workers and the public from fire-related hazards. The Final Project-Specific Construction Fire Prevention Plan shall include the | During Construction | Applicable | **Complete.** SDG&E submitted the CFPP for CPUC review and approval on November 13, 2020 and submitted a revised version on January 9, 2021. |

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| provisions in the TL 6975 Construction Fire Prevention Plan provided in Appendix 4.8-B of the Proponent's Environmental Assessment (SDG&E, 2017b), as well as the requirements listed below. Prior to construction, SDG&E shall contact and consult with the San Diego Unit of CAL FIRE, the San Diego County Fire Authority, and the fire departments of the cities of Carlsbad, Escondido, San Marcos, and Vista to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate prevention measures to be taken. SDG&E shall submit verification of its consultation with the appropriate fire departments to the CPUC Project Manager.<br><br>SDG&E shall submit the CFPP to the CPUC Project Manager for approval 60 days prior to commencement of construction activities and shall make the approved Final CFPP available to all construction crew members prior to construction of the Project. The Final CFPP shall list fire safety measures including fire prevention and extinguishment procedures, as well as specific emergency response and evacuation measures that would be followed during emergency situations; examples are listed below. The Final CFPP also shall provide fire-related rules for smoking, storage and parking areas, usage of spark arrestors on construction equipment, and fire-suppression tools and equipment. The Final CFPP shall include or require, but not be limited to, the following:<br><br>□ SDG&E and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available in the study area for fire protection.<br>□ All construction vehicles shall have fire suppression equipment.<br>□ SDG&E shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire.<br>□ As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.<br>□ SDG&E shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site.<br>□ SDG&E and its contractor shall cease work during Red Flag Warning events in areas where vegetation would be susceptible to accidental ignition by Project activities (such as welding or use of equipment that could create a spark).<br>□ At each construction site, after construction has been completed for the day, the project contractor and/or the SDG&E Contract Administrator will perform visual inspections to ensure that all ignition risks are minimized or eliminated before leaving the work site. | | | CPUC issued its approval of the CFPP on February 18, 2021. A Copy of the coordination with local fire protection agencies was provided with the NTPR-1 package. No additional coordination is required with local agencies as part of NTPR-3 since the work areas are located in Segment 1 of the Project which was included in the overview map used for agency coordination. |

**ATTACHMENT B: MMRCP REQUIREMENTS TRACKING TABLE**

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM) | TIMING | APPLICABILITY TO NTPR-3 | STATUS |
|---|---|---|---|
| Successful implementation of Mitigation Measure WIL-1: Fire Safety would be demonstrated by the development of a Final CFPP in consultation with local fire authorities which documented and submitted to the CPUC for final approval. Additionally, successful implementation of Mitigation Measure WIL-1 would require that SDG&E and its contractor comply with all components of the Final CFPP, that ignition from project construction activities is promptly reported to the fire department(s) with jurisdiction, and that when it is safe to do so, any project-caused ignition is suppressed immediately. | | | |



Applicable to NTPR-3 – Measure to be Implemented During Construction/Restoration/Operation
Not Applicable to NTPR-3
Applicable to NTPR-3 – Pre-Construction Status Pending/Ongoing
Applicable to NTPR-3 – Pre-Construction Status Complete/Approved

# ATTACHMENT C
# Post Data Recovery Summary Report

June 8, 2022

Cheryl Bowden-Renna

Principal, Cultural Resources Specialist
SDG&E Environmental Services
8315 Century Park Court, CP21E
San Diego, CA 92123

**Subject: Letter Report: eTS 28798—Post Data Recovery Summary Report at Site P-37-032160/CA-SDI-20363 for the TL 6975 Escondido to San Marcos 69kV Transmission Line Project, San Diego County, California**

Dear Ms. Bowden-Renna:

This letter report prepared by ICF under contract to kp Environmental (Release Order # eTS 28798) summarizes the results of data recovery investigations conducted for the TL 6975 69kV Project (Project) in the City of San Marcos in May of 2022 (Figures 1 and 2). Cultural resources studies for the Project identified that prehistoric habitation site P-37-032160/CA-SDI-20363 is located within the Project Area. Data recovery was conducted at five locations where construction related disturbances could potentially impact subsurface site deposits. Data recovery was performed in accordance with the methods and procedures outlined in the Data Recovery Plan (DRP) (ICF July 2021) and the mitigation measures set forth in the Initial Study/Mitigated Negative Declaration (IS/MND) (ESA January 2020) for the Project, specifically Mitigation Measure CUL-4 Data Recovery Excavations at P-37-032160.

## Project Description

SDG&E is proposing to ensure the reliability of the transmission system, meet State of California policy goals, accommodate load growth, and improve system efficiency in SDG&E's service territory. In this effort, SDG&E proposes construction and reconductoring of approximately 12 miles of 69 kilovolt (kV) overhead electric power line from the existing San Marcos Substation to the existing Escondido Substation. The Proposed Project would be a combination of new overhead single-circuit electric power line structures, rebuild of existing structures from single circuit to double circuit, and reconductoring and re-energizing of existing conductors. Components of the Proposed Project are located in the Cities of Carlsbad, Escondido, and San Marcos, as well as unincorporated San Diego County, in San Diego County, California. The proposed power line would be constructed and/or rebuilt within SDG&E right-of-way (ROW),

collocated with existing utility infrastructure, with minimal new ROW required. The Proposed Project starts from SDG&E's existing San Marcos Substation in the west and terminates at SDG&E's existing Escondido Substation in the east (Figures 1 and 2).

## Project Personnel

Patrick McGinnis, MA, RPA, served as principal investigator. Karen Crawford, MA RPA provided technical review. Patrick McGinnis; Rachel Droessler, MA; and Nara Cox, BA conducted the survey efforts in January, February, and March 2017. Patrick McGinnis, authored this report and Rachel Droessler prepared maps and GIS associated with this study.

## Site P-37-032160/CA-SDI-20363

Site P-37-32160/CA-SDI-20363 is a prehistoric site originally identified during monitoring for the San Marcos High School Expansion Project in 2001 by ASM Affiliates (Hale and Castells 2013). Upon discovery, the site was tested using shovel test pits, test units, and trenching to determine the extent of the site within the project limits. Flaked stone, ground stone, shell, fire-affected rock, bone, and ocher were recovered. San Marcos Unified School District, the San Luis Rey Band of Mission Indians, and the Pechanga Band of Luiseño Indians agreed to cap the site, leaving much of it intact below the ground surface. The site is significant, extensive and recommended eligible for the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP). The site location was pedestrian surveyed for the current project in 2018 and no cultural remains were identified on the surface. Subsurface survey was also conducted through the excavation of 12 shovel test pits at seven pole locations adjacent to the previously identified site boundary. Three pole locations (Location #8, Location #11, and Location #12 were positive for subsurface archaeological deposits and the site boundaries expanded. Pole Location #7 was previously identified at the southern boundary of P-37-32160/CA-SDI-20363. Three shovel test pits were excavated at and in the immediate vicinity of Location #7 and were negative for subsurface deposits. The site boundary was adjusted to the north accordingly.

## Data Recovery Work

Per the mitigation measures as set forth in the IS/MND (ESA 2020) for the Project data recovery was conducted at the locations within the archaeological site. Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160/CA-SDI-20363 states *that Prior to the start of any Project-related ground disturbing activities within 250 feet of archaeological site P-37-032160, data recovery excavations shall be carried out to collect scientifically consequential data associated with known resource P-37-032160 where Project-related ground disturbing activities including but not limited to pole replacement, trenching, potholing, and AC mitigation well and test station installations will be carried out. Prior to the start of the data recovery excavations, a research design shall be prepared by the Qualified Archaeologist outlining the research questions to be addressed as part of the data recovery, as well as the field and lab methods and any special studies proposed to obtain the scientifically consequential information. The research design shall be submitted to SDG&E and CPUC for review and approval prior to the*

*start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&E and submitted to the San Luis Rey Band of Mission Indians for review and comment. The final data recovery report shall be placed on file at the South Coast Information Center.*

Project components requiring data recovery include the replacement of three poles at Locations 8, 11, and 12. Location 8 will be a pier foundation pole requiring an 8-foot by 8-foot area of ground disturbance for the pole with a 30-inch diameter hole for the pole to be set in. Locations 11 and 12 will be direct bury poles requiring six feet of work space surrounding a 24-inch diameter hole to set each pole. Initially, and as described in the Data Recovery Plan (ICF 2021), temporary shoo-fly poles were proposed for each of the three pole locations. However, further field engineering has determined that Locations 11 and 12 will either not require temporary poles or, if conditions change, temporary poles would be truck mounted. Location 8 will require a temporary pole but this pole will be located within an existing open trench for utility relocation work performed by the City of San Marcos. In any case, no further ground disturbance will be required for temporary poles and additional recovery units are not necessary.

Additionally, the installation of a coupon test station and a deep well adjacent to the site are proposed. As the northern extent of the site boundary has not been previously identified, shovel test pits were excavated at each location to identify if the site boundary extended to the where the proposed coupon test station and deep well locations are proposed.

Data recovery work took place between April 25, 2022 and May 25, 2022 (See Figure 3-Confiential). Work was first conducted at Locations 11 and 12, followed by Location 8 and, finally, the Coupon Test Station #2 and Deep Well #11. Additionally, a conduit for streetlight control wires was identified in the west wall of Unit 3 (Location 8) at approximately 73 centimeters (cm) depth. The conduit line was relocated to an existing trench approximately 10 feet southwest of Unit 3 after consultation between SDG&E, the construction contractor (Henckels and McCoy), and City of San Marcos officials. It was also determined that the archaeological team would excavate the trench and perform data recovery during this excavation. The trench work occurred between May 17-19, 2022. Weather on work days (April 24-May 22) varied from overcast to very sunny and was warm throughout. No precipitation occurred during the time data recovery was undertaken. The STPs excavated at Coupon Test Station #2 and Deep Well #11 were excavated at night on May 25, 2022 to accommodate traffic concerns. Weather during this work was overcast and cool. All work was conducted in accordance with the methods described in the Data Recovery Plan for the Project (ICF 2021).

Data recovery personnel included Lauren Downs, RPA; Patrick McGinnis; Nara Cox Hector Galvez, BA; Eduardo Toscano, BA; and Samantha Davis, BA. All work included Luiseno Native American Monitors associated with Saving Sacred Sites including Shelley Nelson, Mario Herrera and Vi'i Sialoi. Jesse Shelmire, paleontologist with the San Diego Natural History Museum, monitored the excavation for paleontological resources and assisted in the identification of the age and composition of site soils.

## Data Recovery Results

A total of three 1-meter by 1-meter data recovery units were excavated, one each at Locations 8, 11, and, 12. A 3-meter trench was excavated next to the unit at Location 8 to accommodate the rerouting of two streetlight control electrical utility lines which would have otherwise been where the new pole is to be installed. The trench excavation was 30 cm wide and 75 cm deep. A 60-cm wide STP was excavated at the location of Coupon Test Station #2 on San Marcos Boulevard. An additional STP was planned for the location of Deep Well #11, west of Coupon Test Station #2, but the presence of multiple PVC water lines required a deviation from the Data Recovery Plan and 4-inch (10 cm) auger was used instead (Figure 3). Per the Data Recovery Plan, imported fill and overburden was removed by the SDG&E construction team under the supervision of archaeologists. Native and midden soils were excavated by the archaeological team and screened through 1/8-inch mesh. Midden soils were very dark brown in color, moist, and loamy in composition which contrasted dramatically from the soils above and below. In general, it was apparent that the midden soil was overlain by fill soil (mostly imported) and underlain by thick gray brown clay. There are variations in the thickness of the fill across the site and, in some cases, other disturbances such as previous utility lines installation and agricultural uses also disturbed the midden layer.

Artifacts were bagged and the bags labeled on site. Groundstone artifacts, stone tools, and fire-affected rock were bagged separately and were not washed for potential analysis at a later date. Faunal remains appear to all have been rodent/small mammal and may be obtrusive. Further analysis is pending. Small shell fragments of lacustrine, terrestrial l, and marine shell were identified but only within disturbed soils and are likely imported and not related to habitation activities. Only small ambient gravel size or smaller charcoal was recovered and a few samples were placed in foil for potential analysis. Additionally, 10 cm x 10 cm soil samples were taken from the midden layer at each unit and bagged for potential analysis.

The following results and interpretations are considered preliminary and based on field observations only. Recovered artifacts are still being processed in the laboratory and the counts and classifications of the recovered materials is likely to change based on the more refined analysis that is in progress.

### *Location 11, Unit 2*

Location 11/Unit 2 was located in a landscaped area between the sidewalk and private property that is separated by a chain link fence. The Patriot Engineering crew rolled back portions of a chain link fence, cut vegetation, and removed overburden of mixed redeposited fill soil. The fill layer consists of 10 YR 5/8 yellow brown sandy clay loam with imported gravel and modern trash mixed throughout. Concrete and asphalt chunks are present and irrigation lines were identified approximately 30 cm below the ground surface. Soil transitioned at 90 cm to a mix of the fill described above, mottled with 10 YR 3/2 dark brown sandy loam midden soil as recognized from previous testing. At this point, the Patriot crew was dismissed and excavation continued with the archaeological crew. Soils were excavated by strata. The mottled and mixed fill layer included asphalt chunks and construction debris

continuing until 128 cm where it became completely midden soil. This mixed layer was dry screened through 1/8-inch mesh however no artifacts were recovered in soils from the mixed fill and midden soil layer. It appears likely that the midden layer is truncated and was mixed with the upper fill soils and redeposited on top of what was left of the intact midden soil.

The midden soil layer varied between 10-12 cm thick. Within the midden layer four metavolcanic flakes, three milky quartz flakes, two volcanic flakes, and two historic ceramic vessel sherds were recovered. The soil changed at approximately 140 cm to a moist, sticky, thick, sandy reddish thick clay. This layer was excavated to 150 cm and screened. The clay soil was thick and difficult to push through screens. No artifacts were recovered from the clay layer. At 150 cm depth, a 4-inch (10 cm) diameter auger was used to excavate down to 200 cm. The clay layer identified in the 140 cm level continued to 185 cm at which point the clay became lighter and less dense but retained the sandy reddish color noted earlier. This layer was identified by the on-site paleontologist as decaying bedrock and was sterile for cultural materials. The unit was terminated due to the sterility of the soil. No artifacts or midden soil were recovered from the unit below the depth of 140 cm or above 128 cm. The unit was lined in geotextile fabric that extended above ground level and backfilled.

### *Location 12, Unit 1*

The ground surface of Location 12, Unit 1 was covered in ornamental plants consisting mostly of non-native bunch grasses. The plants were removed and the Patriot Engineering crew removed the imported fill soil. Fill soils consisted of tan silty sand containing modern and historic debris such as concrete, asphalt, glass, and plastic. Some chunks of dark midden soil were observed in the fill at around 70 cm and were pulled and screened. Archeologists took over excavation of the unit at this time. Soil continued to be a mix of yellowish brownish 10YR sandy clay fill and with some midden soil from 70 cm to 124 cm. Modern trash, historic shell, and prehistoric artifacts were also mixed in this disturbed soil layer. Recovered prehistoric artifacts include a basalt core fragment, one groundstone fragment, six metavolcanic flakes, six volcanic flakes and shatter, and one fire-affected-rock. Soil from 70-124 cm appears to be a single layer of mixed redeposited fill and midden soil. At approximately 120-124 cm in depth, the soil changed to mottled dark brown midden soil with whitish, reddish, and yellow decomposing formation soil that was probably once the natural surface. It appears that the native soil and midden soil are mixed probably through historic agricultural use which is apparent in historic aerial photographs dating from the 1950s to the 1970s. This layer continued down to at least 150 cm, but there was a noticeable drop off in the number of artifacts recovered after 140 cm depth. At 150 cm, augering was conducted with a 4-inch (10 cm) diameter auger. From the layer between 124-150 cm one faunal bone fragment, six metavolcanic flakes, three Santiago Peak volcanic flakes, one quartz flake, eleven volcanic flakes, one cryptocrystalline silicate flake, and one groundstone tool fragment were recovered. At 155 cm in depth the soil began to transition to very sandy light yellow tan soil before changing to light olive intact hard sandstone formation at 163 cm. One volcanic debitage was recovered between 150-160 cm and may be anomalous. Augering continued down to 185 cm when the auger encountered impenetrable formation deposits and was halted. Intact midden soil was not present within Unit 1 and all recovered artifacts

were out of their original deposition within a disturbed secondary context. The unit was lined in geotextile fabric that extended above ground level and backfilled.

### *Location 8, Unit 3 and Utility Relocation Trench*

Location 8, Unit 3 was located next to the pole to be replaced. The immediate ground surface was very disturbed with much modern trash and hardware on the surface. The unit location was adjacent to the existing pole with a sidewalk to the west and realtor's sign set on 4"x4" posts immediately to the east. This unit had the thinnest layer of fill over cultural deposits of the three units excavated for the study. All soil was excavated and screened through 1/8-inch mesh by the archaeological field crew. The top layer of soil consisted of 10YR 5/3 redeposited native soil with inorganic fill with much modern refuse and hardware mixed in and very disturbed. This upper layer of soil was different from the previous excavations to the west as it contained much more native soil when compared to imported fill. The soil was dry, sandy silt with some clay, small cobbles, and approximately 30 percent pea sized gravel. Modern materials included nails, wire, paper, plastic, bottle and window glass, brick, concrete, and asphalt chunks. Prehistoric artifacts were also recovered from the disturbed strata including 20 metavolcanic debitage, two milky quartz debitage, two fire affected cobbles and one metavolcanic flake tool. A utility trench was identified within the western edge of the unit and contained much lighter brown, sandy fill soil with gravel than the surrounding soil matrix. The disturbed fill layer extended down to just below 20 cm where it transitioned to mixed fill with increased gravel and 10 YR 3/2 midden soil that has been identified throughout site P-37-032160/CA-SDI-20363. The transition layer between the fill soil and midden was thin, very mottled and difficult to discern as an individual strata and was therefore screened and collected with the upper fill layer. At approximately 45 cm depth a layer of 10 YR 3/2 midden soil was encountered and excavated as single strata. The midden layer extended down to approximately 85 cm although there was a noticeable drop in the number of artifacts recovered as excavation proceeded below 60 cm. Groundstone artifacts were recovered within the midden layer including one complete mano (handstone), one mano fragment, and two metate (grinding slab) fragments. A total of 47 flakes and shatter were recovered with metavolcanic and volcanic materials comprising the majority. A small number of quartz and quartzite flakes were also recovered. Tools recovered from the midden layer include two metavolcanic projectile points, one modified cobble, one split cobble, and two core fragments. Of note was the recovery of a historic whiteware fragment and historic bottle glass shards in the same matrix as the prehistoric artifacts. A single prehistoric brownware sherd was also recovered from the midden soil between 50-60 cm. The trench line in the west wall revealed two 2"-PVC gray conduit lines which ran along that wall of the unit at approximately 73 cm depth. The soil changed at approximately 85 cm depth to grayish brown 10 YR gray clay with little gravel and no cultural material. This soil was then augered in 10 cm incremental levels to a depth of 120 cm with no change in the clay soil. The unit was lined in geotextile fabric that extended above ground level and backfilled.

The presence of the utility lines in the western side of Unit 3 would not allow for the pole replacement at Location 8. After consultation with City San Marcos officials, SDG&E and their respective contractors, it was decided that the conduit lines would be rerouted to avoid the proposed pole location. This would be achieved by cutting the exposing the conduit lines

approximately 10 feet north of Unit 3 and then digging a 30 cm wide and 75 cm deep trench from that point southwest approximately 3 meters to intercept an existing open trench where the same lines were exposed as part of an unrelated City of San Marcos infrastructure upgrade project. The archaeologists dug the entire trench line and screened the soil through 1/8-inch mesh. The soil in the trench was similar to Unit 3; however, it appeared to be somewhat more disturbed most likely due to the trench location being adjacent to existing conduits and the sidewalk. The soil was comprised of roughly four strata including an upper layer of primarily fill with native soil mixed in that went down to approximately 30 cm, a second layer of disturbed mottled fill mixed with some midden soil from 30-50 cm depth before transitioning to mostly midden soil mixed with some fill soil and, lastly, a layer of sterile clay below that. The upper 30 cm of soil contained much modern and historic debris including bottle glass, wire, hardware, paper trash, plastic, fiberglass sheeting, concrete, and asphalt chunks. The upper 30 cm strata yielded a small number of prehistoric artifacts including eight metavolcanic flakes and one obsidian flake that appears to be of Coso Volcanic Field origin. The 30-50 cm mixed strata contained two metavolcanic core fragments, some fire affected cobbles, and a single metavolcanic flake. The third strata was mixed midden and extended from 50 cm down to 70 cm, at which point it transitioned to sterile brownish gray clay noted elsewhere. The 50-70 cm mixed strata contained 14 metavolcanic flakes, three volcanic flakes, one milky quartz flake, a metavolcanic core fragment, and of particular interest a prehistoric brownware sherd. Additionally, a historic whiteware dish sherd and a historic chunk of coal were identified. Initially, the construction crew was going to reroute the conduit line upon completion of the archaeological excavation. However, project engineers learned that additional permits were required for the City of San Marcos which would delay the reroute for a short time and asked that the trench be backfilled. Plastic tarps were used to line the trench until conduit can be replaced at which time all work will be monitored. Should further excavation be necessary outside of the trench, an archaeological crew will perform these duties.

### *Coupon Test Station #2 and Deep Well 11*

Excavation of STPs at Coupon Test Station #2 and Deep Well 11 was conducted after 9:00 PM on the evening of May 25, 2022. Initial excavation was conducted by a crew from Patriot Engineering who began at Coupon Test #2 to remove overburden/fill soils. The Patriot crew excavated the STP hole approximately down to 100-110 cm and 60 cm wide. Soil was a medium brown very compact fill with asphalt and concrete chunks, various hardware, clay clods and modern trash mixed in. At about 60 cm, soil changed to native, light to medium brown, compact silty sand, very compact with small rocks (fist sized or smaller). Beginning at 100-110 cm depth, soil was augered with a 4–inch diameter auger but had to be broken up with a dig bar first for the auger to excavate. The STP was augured down an additional 30 to 140 cm before encountering impenetrable decomposing granite. Archaeologists and Native American monitors spread the soils and examined for artifacts and the presence of the very dark brown midden soils associated with the archaeological site. No artifacts or midden soil were present and the archaeological site boundary does not extend this far north at this location. The team then moved approximately 70 feet west to the Deep Well #11 location. Four PVC water lines (two 6" dia. and two 2" dia.) were encountered within the 60 cm hole at

around 50 cm depth. Lines may have to be cut for deep well installation. The presence of the water lines required the crew to deviate from the STP methods outlined in the Data Recovery Plan and auger this location instead of digging an STP. Soil above water lines was mottled medium brown and reddish fill. Below the water lines, soil was semi-moist, fine grained medium brown sand. Soil transitioned to a slightly more reddish-brown color loamy sand down to at least 160 cm. Excavation was terminated at 160 cm. The auger hole was negative for artifacts and midden and confirms that the site boundary does not extend as far north the middle of San Marcos Boulevard. Both the STP and auger boring were back filled and covered with the soil that was excavated.

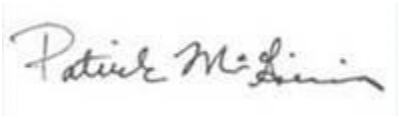
## Recommendations

Preliminary evidence suggests that the locations of the three 1- by 1-meter data recovery units excavated for the project lie on the periphery of the site. The data recovery work generated somewhat low yields in density and diversity of artifacts. However, the work did produce some interesting results including the recovery of obsidian flakes and brownware sherds at Location 8. The presence of obsidian is indicative that the occupants of the site were part of a larger trade network that extended at least as far as the Owens Valley approximately 200 m miles north of the site. The identification of two brownware sherds at Location 8 is also somewhat surprising given that previous work at the site did not identify artifacts associated with the Late Prehistoric Period such as small projectile points or prehistoric ceramics and the site was assumed to represent an Archaic Period site. The presence of prehistoric ceramics does not discount that the site dates back to the Archaic, but may indicate that it also has a Late Prehistoric component. Additionally, the presence of historic ceramics at Location 11 and Location 8 in the dark midden soil poses interesting questions on whether they arrived in the midden through human disturbance, bioturbation, or if this was the original deposition of the artifacts, representing a Proto-Historic Period occupation. The historic ceramics came out of deposits that were solidly midden and not mottled by obvious disturbance. Further analysis and dating of these materials may help answer these questions. Groundstone tools, flake tools, and projectile points were recovered which may be suitable for protein residue and other analyses. Soil samples could produce botanical remains suitable for analysis. The obsidian flakes will need to be measured to identify if they are large enough for obsidian hydration and XRF study which could provide information regarding the chronology of the site and confirm the location of the source(s).

The Data Recovery Plan for the site includes provisions for monitoring any ground disturbing activities and archaeological excavation of site-associated soil within the site boundary of P-37-032160/CA-SDI-20363 and a 250-ft buffer. Should project plans change and work plans be altered from the approved plans, such work will be subject to review and further archaeological work as outlined in the Data Recovery Plan. Artifacts recovered during the current excavation will be temporarily curated at the ICF laboratory. All artifacts and materials will be properly prepared for archival storage in accordance with the Secretary of the Interior's Standards for Archaeological Documentation and a complete catalog of all collected items will be prepared to accompany the collection. Reasonable efforts will be made with private landowners to release discovered cultural materials recovered from private land. Recovered prehistoric artifacts may also be repatriated to the most likely descendant

tribe for reburial if agreement is reached between the landowner, SDG&E, and the lead agency.

Sincerely,



Patrick McGinnis
Archaeologist

**cc:** Michael Vader, ESA
Trevor Pratt, CPUC
SCIC

**Attachments:**

Figure 1- Project Vicinity Map
Figure 2 – Reginal Vicinity Map
Figure 3 - Data Recovery Locations (Confidential)

**References:**

Hale, Micah, and Shelby Gunderman Castells. 2013. Archaeological Monitoring and Significance Evaluation of CA-SDI-20363 for the San Marcos High School Construction Project, San Diego County, California. Technical report on file at the South Coastal Information Center.

ICF. 2020. San Marcos To Escondido Tie Line Tl 6975 69kV Project, Data Recovery Plan For Site P-37-032160/CA-SDI-20363, San Marcos, California.

ESA. 2021. San Diego Gas & Electric San Marcos To Escondido Tie Line (Tl) 6975 69kV Project Final Initial Study/Mitigated Negative Declaration.


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**Figure 1**
**Regional Location**
**Data Recovery for TL6975 Project San Marcos, California**

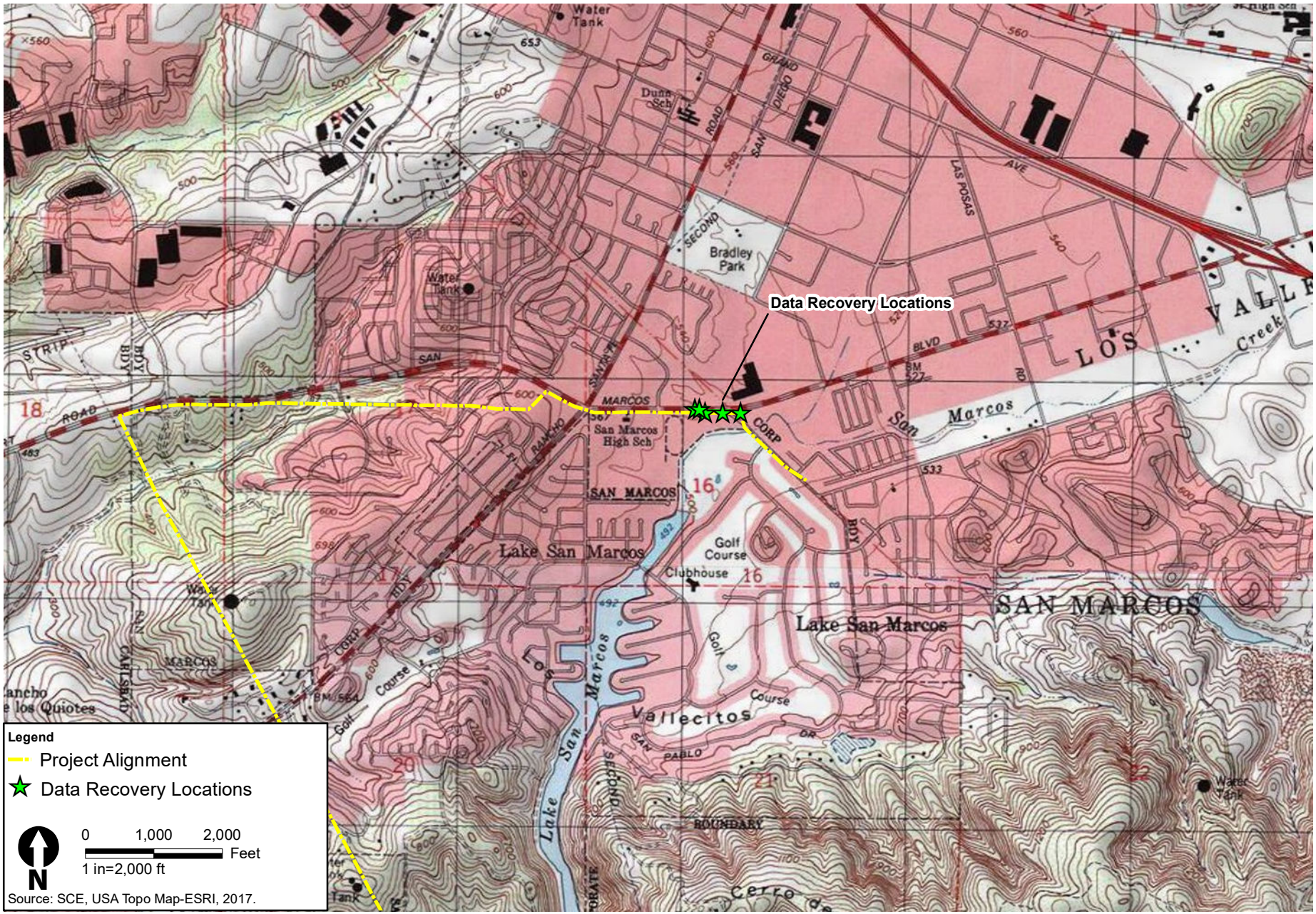


**Figure 2**
**Project Vicinity**
**TL6975, San Marcos, California**