



William Yee
TL6975 Environmental Project Manager
San Diego Gas & Electric Company
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October 22, 2021

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

Re: Minor Project Refinement No. 1 for the TL 6975 San Marcos to Escondido Project.

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 1 (MPR-1) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-1 will authorize the use of an additional temporary work area located between the existing work areas for existing transmission tower Z414912 (Location 85) and existing transmission tower Z414913 (Location 86) to allow adequate workspace for a snub loading site (snub site). The requested additional work area will be approximately 11,250 square feet, or 0.26 acre. The requested MPR-1 work area is located entirely within the SDG&E right-of-way (ROW) south of Quest Haven Road in San Marcos, California, and will be used to facilitate wire installation operations associated with the construction of Segment 3 of the Project. Please refer to **Attachment B, MPR-1 Figure** and **Attachment C, MPR-1 Site Photographs** to view the MPR-1 work area.

Attachment A: TL6975 Minor Project Refinement Form

Attachment B: MPR-1 Figure

Attachment C: MPR-1 Site Photographs

Description of MPR-1 Workspace and Activities

As stated above, MPR-1 would authorize SDG&E to use a new temporary work area (11,250 square feet) for a snub site between Locations 85 and 86. An existing work area was included in the Final Initial Study / Mitigated Negative Declaration (IS/MND) and approved Notice to Proceed No. 1 (NTPR-1), and it is in the same location as the MPR-1 work area. However, after the field constructability review, it has been determined that the work area will need to be increased in size to accommodate the required equipment. The additional work area is necessary to safely and efficiently complete the installation of the new conductor between Locations 70-94 in Segment 3. Please see **Attachment A, MPR-1 Form**, for more information on the purpose and need for the proposed MPR-1 work area.

Vegetation will be trimmed within the work area as necessary. There are no trees present within the MPR-1 work area. The MPR-1 work area will be utilized for approximately 5 months and activities will begin immediately following MPR-1 approval. Utilization of the MPR-1 work area would not be continuous, and the actual wire pulling work would take approximately 2 weeks. Following the use of the MPR-1 temporary work area, the area will be stabilized with a native seed mix in accordance with the Stormwater Pollution Prevention Plan (SWPPP), and the impacts to coastal sage scrub (CSS) habitat would be restored according to the SDG&E Natural Communities Conservation Plan (NCCP) Enhancement and Monitoring Program as the impacts would be over 500 square feet.

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's NTP-1 approval letter dated September 9, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring, Reporting and Compliance Plan (MMRCP) pre-construction requirements described in NTP-1. No permits are required for activities that will be performed within the MPR-1 work area.

MPR-1 Request for Approval

SDG&E respectfully requests approval of MPR-1 to utilize the proposed temporary work area between Locations 85 and 86, by November 12, 2021. The new temporary work area would be used in accordance with conditions outlined in the CPUC's NTP-1 approval letter, as well as requirements in the IS/MND and MMRCP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at wyee@sdge.com.

Sincerely,



William Yee
TL6975 Environmental Project Manager

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

ATTACHMENT A
MPR-1 Form



TL6975 San Marcos to Escondido 69 kV Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the IS/MND, create a new significant impact, are located within the geographic boundary of the study area of the IS/MND, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: October 22, 2021

Report No.: 1

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 1 (MPR-1) temporary work area is located entirely within SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-1 temporary work area is located east of existing transmission tower at Location 85 and west of existing transmission tower at Location 86, in the City of San Marcos.

Land Use/Vegetative Cover: The 11,250-square foot MPR-1 work area (0.26-acre) is entirely within moderate to high-quality coastal sage scrub (CSS).

Sensitive Resources: The MPR-1 work area contains approximately 11,250 square feet of CSS.

**Modification
From:**

☐ Permit

☐ Plan/Procedure

☐ Specification

☐ Drawing

☐ Mitigation
Measure

☒ Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-1 for a new temporary work area to be used as a snub loading site (snub site) for the TL 6975 San Marcos to Escondido Project (Project). The new temporary work area would be located between Location 85 and Location 86, adjacent to an existing work area approved in Notice to Proceed No. 1 (NTP-1). The new MPR-1 work area would be approximately 11,250 square feet (0.26 acre).

The additional work area is necessary to safely and efficiently complete the installation of the new conductor between Locations 70-94 in Segment 3. The MPR-1 work area will be used for temporary laydown of materials and equipment and will provide the space necessary to accommodate a safe wire installation operation associated with Segment 3 construction (See **Attachment B, MPR-1 Figure**). Vegetation will be trimmed within the work area as necessary

to maintain the root structure and seed bank. The trimming will be no less than 4 inches above the ground per the SDG&E Natural Communities Conservation Plan (NCCP). The MPR-1 work area may be utilized for up to 5 months and activities will likely begin immediately following MPR-1 approval. Utilization of the MPR-1 work area would not be continuous, and the actual wire pulling work would only take about 2 weeks. Following the use of the MPR-1 temporary work area, the area will be stabilized with a native seed mix in accordance with the Stormwater Pollution Prevention Plan (SWPPP), and the impacts to CSS habitat would be restored according to the NCCP Enhancement and Monitoring Program as the impacts would be over 500 square feet. **Attachment B, MPR-1 Figure** shows the location of the MPR-1 temporary work area.

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

Original Condition: The Project's Final Initial Study / Mitigated Negative Declaration (IS/MND) and NTP-1 Mapbook included a smaller work area (35 x 50 feet) in the location of the proposed MPR-1 work area. The MPR-1 work area is located within the geographic study area of the IS/MND and immediately adjacent to an approved work area and therefore has been previously analyzed.

Justification for Change: Following constructability review in the field, the construction contractor identified the need to expand the approved snub site in order to safely and efficiently facilitate Segment 3 reconductoring activities. Existing lattice tower load constraints prevent conductor stringing through Location 85 and Location 86 without the use of a snub site. The snub site will allow space for equipment and construction personnel to pull, hold and splice conductor entering from the west at Location 85 and from the east at Location 86. These activities will reduce tension on the adjacent towers. Once the conductor is spliced at the snub site, it will be placed in a sleeve and raised into position under controlled tension. The total size of the requested MPR-1 work area has therefore been designed so that the angle required for adequate tension can be achieved for the line from both directions. The angle required for adequate tension also requires that the wire pulling equipment be set up in line with the overhead conductor, which is the reason the snub site cannot be located within the existing access road.

To clarify, although the purpose of the existing 35 x 50-foot work area was not expressly defined in the IS/MND or NTP-1, its intended purpose was to be utilized as a snub site. As stated in NTP-1, the activities described therein are meant to illustrate the more substantial activities to occur during construction, and are not comprehensive of every activity and method to be used to complete the work described. The purpose of the MPR-1 work area and the related methods for reconductoring described herein do not constitute a Project change, however the expanded work area and associated vegetation removal are being proposed as a change in this MPR-1 request.

Maps & Figures: Refer to **Attachment B, MPR-1 Figure**, for a map of the proposed MPR-1 temporary work area location. Refer to **Attachment C, MPR-1 Site Photographs**, for pictures of the current conditions within the MPR-1 temporary work area.

Environmental Impact: Utilization of the MPR-1 temporary work area would not change the nature or increase the severity of any impacts disclosed within the IS/MND; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. Utilization of the MPR-1 temporary work area is anticipated to increase the

total temporary impact area for the Project by approximately 0.26 acre containing approximately 11,250 square feet of CSS. Vegetation trimming will be required within the MPR-1 temporary work area. No other ground disturbing activities are proposed within the MPR-1 work area. No special-status species were identified within the proposed MPR-1 work area. The impacts to CSS resulting from the MPR-1 work area would be mitigated through the NCCP Enhancement and Monitoring Program. Regarding the drawdown of impacts from the total mitigation impact cap, there are still 17.214 acres of mitigation credits remaining and the approval of MPR-1 would not cause the impact cap to be exceeded ¹.

According to the Project's Cultural Resources Monitoring Plan (CRMP), the proposed MPR-1 work area is within an area determined to have a high potential for buried archaeological deposits; however, there are no known cultural resources within the proposed MPR-1 work area. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed work area for MPR-1 is located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process, and within SDG&E ROW.

<u>Resources:</u>			
Biological	<input type="checkbox"/> No Resources Present	<input checked="" type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
<p>Previous Biological Survey Report Reference: Biological resources along the Project alignment were studied, reviewed, and documented as part of the TL6975 Project's Proponent's Environmental Assessment (PEA). Biological Resources were also discussed within the CPUC-conducted CEQA review process. Consistent with Appendix E of the IS/MND, CSS is present within the proposed MPR-1 work area. A pre-construction survey was conducted for the MPR-1 work area on October 15, 2021. The Project biologist verified that the current condition of the MPR-1 work area was dominated by CSS which was consistent with the results provided in previous biological studies. There were no special-status plant or animal species observed during the survey.</p>			
Cultural	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, changes would not affect resources
<p>Previous Cultural Survey Report Reference: Cultural resources within the Project's study area (including the MPR-1 work area) were studied, reviewed, and documented as part of the Project's PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's IS/MND, Section 3.5). There are no known sensitive cultural resources within the MPR-1 work area. However, the proposed MPR-1 work area is located in an area determined to have a high potential for archaeological deposits. A pre-construction clearance survey will be performed by a cultural monitor prior to the start of MPR-1 activities.</p>			

¹ There are approximately 17.214 acres of mitigation credits remaining in the 5-year LEHCP per the Proof of Mitigation Credits Letter provided to the CPUC in compliance with MM BIO-1 on June 18, 2021.

Disturbance Acreage Changes: ☒ Yes ☐ No

Original disturbance acreage: The existing snub site work area between Locations 85 and 86 was approximately 35 by 50 feet, which is 0.04 acre, or 1,750 square feet of temporary disturbance to CSS.

New disturbance acreage: The proposed MPR-1 work area is approximately 65 by 200 feet. Not including the existing 35 by 50-foot work area, this results in 11,250 square feet (0.26 acre) of new temporary disturbance to CSS.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, Seismicity, Paleontological Resources	<input type="checkbox"/> Y	MPR-1 does not involve the installation of any new facilities or performance of any new activities. Vegetation trimming will occur to a height of 4 inches above the ground. No other ground disturbance is anticipated within the MPR-1 work area. Accordingly, utilization of the new temporary work area would not create any new geological related hazard not previously disclosed in the Project's IS/MND, Section 3.7. Following the use of the MPR-1 temporary work area, the site will be stabilized in accordance with the SWPPP. In addition, the proposed MPR-1 work area is not located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP).
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to geology, soils, seismicity, or paleontological resources.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	MPR-1 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work area would not require any new potentially hazardous materials to be used, would not create any new hazardous waste, would not expose any sensitive receptors not previously identified, and would not create any new hazard not previously disclosed in the Project's IS/MND, Section 3.9.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input type="checkbox"/> Y	Utilization of the new temporary work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to hydrology and water quality that would be different from the impacts assessed in the Project's IS/MND, Section 3.10. Per the jurisdictional delineation report prepared for the Project's PEA, there are no jurisdictional resources or non-jurisdictional drainages in the vicinity of the proposed MPR-1 work area.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	

Cultural Resources	<input checked="" type="checkbox"/> Y	Review of the Project's previous cultural resources survey reports (prepared for the PEA) determined there are no known sensitive cultural resources within the MPR-1 work area. However, the proposed MPR-1 work area is located in an area determined to have a high potential for archaeological deposits.
	<input type="checkbox"/> N	Vegetation trimming will be performed both by hand and mechanically (skid steer with mower deck or similar equipment). Cultural monitoring would take place during vegetation trimming activities in accordance with the CRMP. No other ground-disturbing activities are proposed within the MPR-1 temporary work area. Impacts would be similar to those disclosed within the Project's IS/MND, Section 3.5.
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 work area would not require agency or tribal consultation in relation to cultural resources.
	<input checked="" type="checkbox"/> N	
Tribal Cultural Resources	<input checked="" type="checkbox"/> Y	As stated in the previous section, there are no known sensitive cultural resources (including tribal cultural resources) within the MPR-1 work area. However, the proposed MPR-1 work area is located in an area determined to have a high potential for archaeological deposits that could include tribal cultural resources. Native American monitoring would take place during vegetation trimming activities in accordance with the CRMP. Impacts would be similar to those disclosed within the Project's IS/MND, Section 3.18.
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 work area would not require agency or tribal consultation in relation to tribal cultural resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	Construction activities within the new temporary work area would not substantially affect traffic and circulation in a manner different from the impacts assessed as part of the Project's IS/MND, Section 3.17. Utilization of the proposed MPR-1 work area would not require traffic control or affect any public roadways. Public access will be restricted using barricades at ingress points of the access road during wire stringing activities for safety reasons. There would be no additional construction crews or change in equipment utilized for MPR-1, that would not already be accounted for in NTP-1.
	<input checked="" type="checkbox"/> N	No new or significant increase to previously identified impacts would occur as a result of the MPR-1 activities.
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	

Air Quality	<input type="checkbox"/> Y	The use of the MPR-1 temporary work area would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's IS/MND, Section 3.3, as there are no new activities or equipment proposed as part of this MPR-1 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	Utilization of the proposed MPR-1 work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were already analyzed in the Project's IS/MND, Section 3.13. There are no new activities proposed as part of this MPR-1 request, and the proposed MPR-1 work area is not within 100 feet of a sensitive receptor. Although the increased size of the work area would require additional vegetation trimming which would generate noise, all activities performed within the proposed MPR-1 work area would take place in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP). Vegetation trimming is anticipated to take up to 3 days, and wire pulling activities would take approximately 2 weeks.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-1 work area. The proposed MPR-1 work area would result in the removal of vegetation as described herein, however the MPR-1 temporary work area is not located within a Key Observation Point (KOP), scenic vista, or other scenic resource identified in the IS/MND, Section 3.1. Therefore, use of the MPR-1 work area would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's IS/MND.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-1 temporary work area would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	

Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>The proposed MPR-1 work area does not contain any trees or special-status plant or wildlife species consistent with the Project's IS/MND Section 3.4. A majority of the proposed MPR-1 work area consists of CSS (approximately 12,570 square feet) which will need to be trimmed in order to create adequate workspace for the snub site. Vegetation trimming will be performed both by hand and mechanically (skid steer with mower deck or similar equipment). Vegetation trimming will be no less than 4 inches above the ground per the SDG&E NCCP to maintain the root structure and seed bank.</p> <p>Impacts to CSS were analyzed in the location of the proposed MPR-1 work area in the IS/MND, as the existing snub site work area is also located within CSS. The increase of the work area, and therefore CSS impacts, would be mitigated through the NCCP Enhancement and Monitoring Program, and would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. A biological monitor would be present during vegetation trimming activities in the MPR-1 work area per APM BIO-8.</p> <p>Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-1 activities, as well as the requirements in the NCCP:</p> <ul style="list-style-type: none"> • APM BIO-1 • APM BIO-2 • APM BIO-3 • APM BIO-4 • APM BIO-6 • APM BIO-7 • APM BIO-8 • APM BIO-9 • MM BIO-1: Project Compliance with the Federal and California Endangered Species Acts. • MM BIO-2: Establishment of Cylindrical Construction Buffers
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The MPR-1 temporary work area would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	<p>As stated within the IS/MND, the proposed MPR-1 work area is located within a CPUC Tier 2 High Fire Threat District (HFTD). There are no new activities proposed as part of this MPR-1 request, only an increase to the existing work area. All activities performed within the proposed MPR-1 work area would take place in accordance with the Project's Construction Fire Prevention Plan, including restrictions and requirements for vegetation trimming. Therefore, the proposed MPR-1 work</p>
	<input checked="" type="checkbox"/> N	

		area would not result in new impacts or a substantial increase in severity of any previously identified impacts to wildfire that were already analyzed in the Project's IS/MND, Section 3.20.
Agency Consultation?	<input type="checkbox"/> Y	The MPR-1 temporary work area would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

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

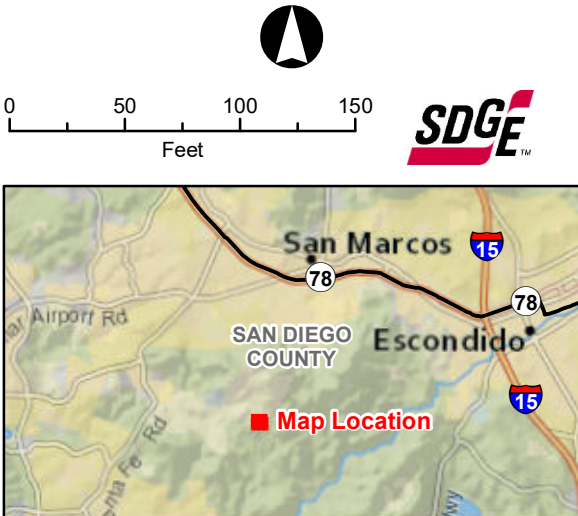
<u>Conditions of Approval or Reason for Denial:</u>	
Prepared by:	Date:

ATTACHMENT B
MPR-1 Figure



**TL6975 SAN MARCOS
to ESCONDIDO PROJECT**
MPR-1 Figure 1
Structure Locations 85 & 86
San Diego County, CA

- LEGEND**
- Existing 138kV Transmission Line
 - State Highway
 - Municipal Boundary
 - Proposed Project**
 - Overhead Work
 - Segment 3 - Reconductor / Re-energize
 - Existing Access Road
 - Temporary Work Area or Grading Impacts
 - Existing ROW
 - MPR-1 Component**
 - Additional Temporary Work Area



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ATTACHMENT C
MPR-1 Site Photographs

MPR-1 PHOTO LOG



Photograph 1:

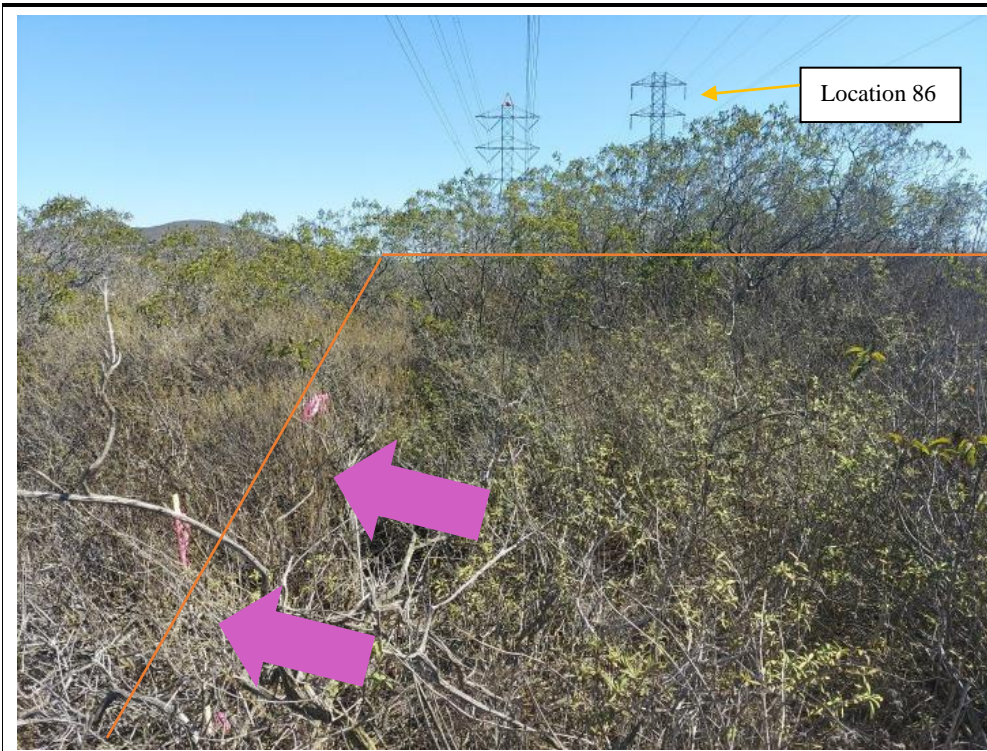
View of the approximate location of the MPR-1 proposed work area, outlined in orange. Facing: NE



Photograph 2:

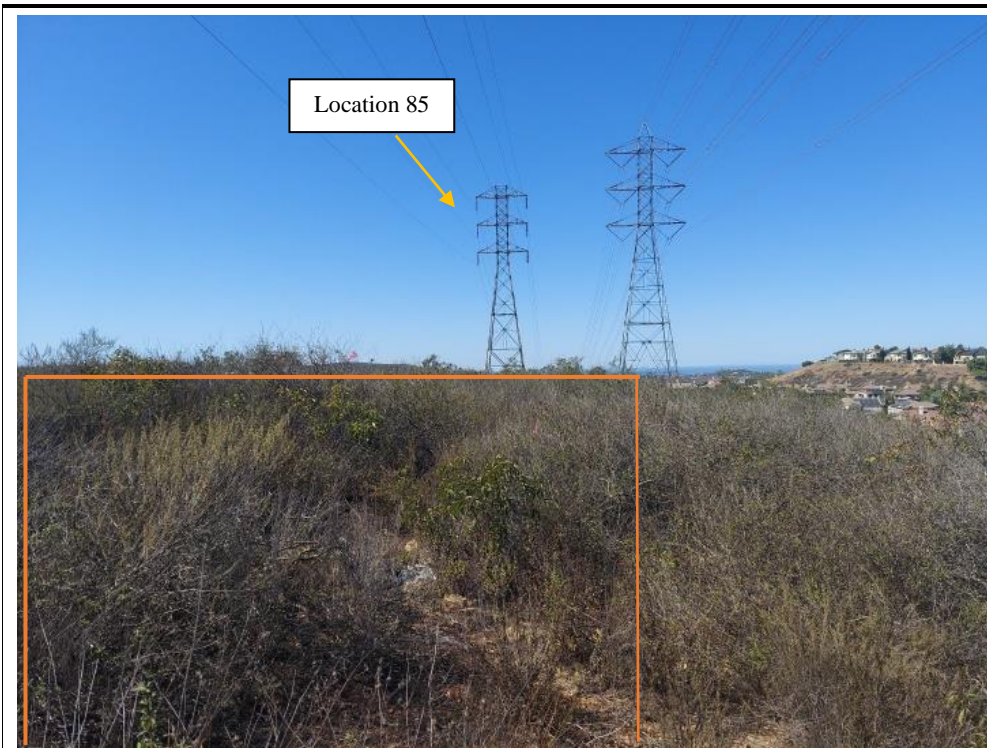
View of the approximate location of the MPR-1 proposed work area, outlined in orange. Facing: NW

MPR-1 PHOTO LOG



Photograph 3:

View of the approximate location of the MPR-1 proposed work area outlined in orange. The north border of the work area is shown with pink stakes. Facing: East



Photograph 4:

View of the approximate location of the MPR-1 proposed work area, outlined in orange. Facing: West