



William Yee
TL6975 Environmental Project Manager
San Diego Gas & Electric Company
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December 9, 2021

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

Re: Minor Project Refinement No. 4 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. 4 (MPR-4) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-4 will authorize the use of two additional temporary work areas located within the transmission right-of-way (ROW) at existing transmission towers, Locations 81 and 89. The requested additional work areas will total approximately 1,183 square feet, or 0.03 acre. The requested MPR-4 work areas are located entirely within the SDG&E ROW 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-4 Figures** and **Attachment C, MPR-4 Site Photographs** to view the MPR-4 work areas.

Attachment A: MPR-4 Form

Attachment B: MPR-4 Figures

Attachment C: MPR-4 Site Photographs

Description of MPR-4 Workspace and Activities

As stated above, SDG&E is requesting approval of two new temporary work areas to facilitate wire installation and reconductoring work associated with Segment 3. The two work areas are described as follows:

- **Location 81 Additional Work Area (WA 81):** The additional work area at Location 81 is being requested in order to allow the crane to set up on the northeast side of the tower rather than the southwest side of the tower where the approved work area is located. The crane cannot be set up underneath the energized lines on the southwest side of the tower, therefore this additional workspace will be needed to allow the crane to be set up to the northeast partially within the existing access road. This would require access to WA 81 and

additional vegetation trimming within WA 81. The additional work area (WA 81) would be approximately 433 square feet (0.01 acre) in size.

- **Location 89 Additional Work Area (WA 89):** The additional work area at Location 89 is being requested to extend the approved work area to allow for the deployment of outriggers to stabilize the crane. The crane can travel along the existing access road to the work area. However, once it reaches Location 89, additional workspace will be necessary to accommodate the approximately 24-foot-wide outriggers, and vegetation trimming would be required. The additional work area (WA 89) would be approximately 750 square feet (0.02 acre) in size.

Vegetation trimming within the MPR-4 work areas would be no less than 4 inches above the ground to maintain the root structure and seed bank per the SDG&E Natural Communities Conservation Plan (NCCP) Operational Protocol No. 36 (Section 7.1). Trimming would be performed using hand tools such as loppers and weed whackers. Wire installation and reconductoring activities in this area are anticipated to take approximately 2 weeks, however the MPR-4 work areas may be utilized for up to 5 months intermittently following approval. Following the use of the MPR-4 temporary work areas, the areas will be stabilized with a native seed mix in accordance with the Stormwater Pollution Prevention Plan (SWPPP), and the impacts to southern maritime chaparral (SMC) habitat would be restored according to the NCCP Enhancement and Monitoring Program as the impacts would be over 500 square feet. Impacts to coastal sage scrub (CSS) within WA 81 do not require mitigation as they are less than 500 square feet.

According to the Project's Cultural Resources Monitoring Plan (CRMP), WA 81 is located adjacent to a cultural Environmentally Sensitive Area (ESA) and WA 89 is located within the ESA-established 100-foot buffer, but not within the known cultural resources site boundary. Exclusionary fencing is required for these ESAs adjacent to the approved work areas for Location 81 and Location 89 pursuant to the CRMP. WA 81 will not affect the placement of exclusionary fencing as shown in the CRMP. The exclusionary fencing at Location 89 was intended to be installed along the shoulder of the existing access road. WA 89 cannot be accessed with this placement, therefore the outriggers for the crane would need to be placed outside of the exclusionary fencing as shown in the CRMP. MPR-4 is proposing the fencing be placed on the outside border of WA 89 to allow space for the crane's outriggers. Wooden mats would be placed under the outriggers for added protection (See **Attachment C, MPR-4 Site Photographs** for example). Please see **Attachment A, MPR-4 Form** for resource discussions.

Preconstruction Requirements and Permit/Approvals

The activities described herein 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-4 work areas.

MPR-4 Request for Approval

SDG&E respectfully requests approval of MPR-4 to utilize the proposed temporary work areas (WA 81, WA 89), by December 16, 2021. The new temporary work areas 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 MMRCPP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at wyee@sdge.com.

Sincerely,

A handwritten signature in cursive script that reads "William R. Yee".

William Yee
TL6975 Environmental Project Manager

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

ATTACHMENT A
MPR-4 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: December 9, 2021

Report No.: 4

Date Approved: December 21, 2021

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 4 (MPR-4) temporary work areas are located entirely within SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-4 temporary work areas are located in the SDG&E ROW near existing transmission towers Location 81 (City of San Marcos) and Location 89 (Unincorporated San Diego County).

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-4 work areas is estimated as follows:

- Location 81 Additional Work Area (WA 81) – 433 square feet (0.01 acre) in coastal sage scrub (CSS).
- Location 89 Additional Work Area (WA 89) – 750 square feet (0.02 acre) in Southern Maritime Chaparral (SMC).

Sensitive Resources: There is CSS and SMC present within the MPR-4 temporary work areas. See resource discussions below.

**Modification
From:**

☐

Permit

☐

Plan/Procedure

☐

Specification

☐

Drawing

☐

**Mitigation
Measure**

☒

Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-4 for two new temporary work areas to be used to facilitate wire installation operations associated with Segment 3 of the TL6975 San Marcos to Escondido Project (Project). See **Attachment B, MPR-4 Figures** and **Attachment C, MPR-4 Site Photographs**, for an overview of the proposed MPR-4 work areas. The two work areas are described as follows:

- **Location 81 Additional Work Area (WA 81):** The additional work area at Location 81 is being requested in order to allow the crane to set up on the northeast side of the tower rather than the southwest side of the tower where the approved work area is located. The crane cannot be set up underneath the energized lines on the southwest side of the tower, therefore this additional workspace will be needed to allow the crane to be set up to the northeast partially within the existing access road. This would require access to WA 81 and additional vegetation trimming within WA 81. The additional work area (WA 81) would be approximately 433 square feet (0.01 acre) in size.
- **Location 89 Additional Work Area (WA 89):** The additional work area at Location 89 is being requested to extend the approved work area to allow for the deployment of outriggers to stabilize the crane. The crane can travel along the existing access road to the work area. However, once it reaches Location 89, additional workspace will be necessary to accommodate the approximately 24-foot-wide outriggers, and vegetation trimming would be required. The additional work area (WA 89) would be approximately 750 square feet (0.02 acre) in size.

Vegetation trimming within the MPR-4 work areas would be no less than 4 inches above the ground to maintain the root structure and seed bank per the SDG&E Natural Communities Conservation Plan (NCCP) Operational Protocol No. 36 (Section 7.1). Trimming would be performed using hand tools such as loppers and weed whackers. The additional MPR-4 work areas are necessary to complete the installation of the new conductor safely and efficiently in Segment 3 (See **Attachment B, MPR-4 Figures**). Wire stringing activities in this area are anticipated to take approximately 2 weeks, however the MPR-4 work areas may be utilized for up to 5 months intermittently following approval. Following the use of the MPR-4 temporary work areas, the areas will be stabilized with a native seed mix in accordance with the Stormwater Pollution Prevention Plan (SWPPP), and the impacts to southern maritime chaparral (SMC) habitat would be restored according to the NCCP Enhancement and Monitoring Program as the impacts would be over 500 square feet. Impacts to coastal sage scrub (CSS) within WA 81 do not require mitigation as they are less than 500 square feet.

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

Original Condition: The MPR-4 work areas are located within the geographic study area of the IS/MND and are adjacent to approved work areas, therefore they have been previously analyzed. When this Project was originally designed, the approved work areas were anticipated to be sufficient for reconductoring activities; however, field constructability review revealed the MPR-4 work areas would be required for the reasons discussed below.

Justification for Change:

Following constructability review in the field, the construction contractor identified the need to expand the approved work areas at Locations 81 and 89 in order to safely and efficiently facilitate Segment 3 reconductoring activities.

WA 81

Following the field constructability review, it was determined that the crane could not safely set up on the southwest side Location 81 under the existing energized overhead power lines, where the approved work area is located. Therefore, WA 81 is being proposed so that the crane can set up on the northeast side of Location 81. Setting from the northeast side of the tower would keep the crane away from the energized lines and provide a better angle for the overhead work.

WA 89

Following the field constructability review, it was determined that the existing work area for Location 89 did not include sufficient space for the 24-foot-wide crane outriggers. The crane can travel along the existing access road up to the existing Location 89 work area without widening the access road, however, there is not enough space adjacent to the road to deploy the outriggers that stabilize the crane when it is carrying a load. Therefore, WA 89 is being requested to allow the space required for the outriggers.

Maps & Figures: Refer to **Attachment B, MPR-4 Figures**, for maps of the proposed MPR-4 temporary work area locations. Refer to **Attachment C, MPR-4 Site Photographs**, for pictures of the current conditions within the MPR-4 temporary work areas.

Environmental Impact: Utilization of the MPR-4 temporary work areas would not substantially 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. The MPR-4 work areas are anticipated to increase the total temporary impact area for the Project by approximately 433 square feet of CSS and 750 square feet of SMC.

Temporary impacts resulting from MPR-4 are estimated in the table below:

MPR-4 Work Area	Coastal Sage Scrub (CSS)	Southern Maritime Chaparral (SMC)	Total
WA 81	433 sf	0 sf	433 sf (or 0.01 acre)
WA 89	0 sf	750 sf	750 sf (or 0.02 acre)
Total:	433 sf	750 sf	1,183 sf (or 0.03 acre)

The Impacts to SMC resulting from the utilization of WA 89 would be mitigated through the NCCP Enhancement and Monitoring Program, which is also incorporated into the 5-year Low Effect Habitat Conservation Plan (LE-HCP). Under the authorization of the LE-HCP, the accounting of all habitat modification is completed on an annual basis and the total habitat modification allowed is 60 acres. When the Project was permitted a balance of 17.214 acres remained.¹ Areas purposefully denuded of vegetation, termed bare ground, and non-native weedy vegetation impacted by human disturbance, termed disturbed habitat, are not considered in this calculation. As a result, the table below calculates impacts to habitat as a result of the MPRs to date, such as coastal sage scrub, southern maritime chaparral and coast live oak woodland.

With a total of 0.42 acre of impacts resulting from MPRs thus far (including this MPR-4 Request), this would result in a balance of 16.794 acres remaining of habitat to be modified or impacted under the current HCP “take authorization.” In addition, three (3) acres of habitat was proposed to be modified for the TL6975 Project as originally approved, which would result in an estimated 13.794 acres remaining under the current HCP “take authorization.” Therefore, the MPR-4 impacts would not cause the available acreage to be exceeded. Impacts to CSS within WA 81 do not require mitigation as they are less than 500 square feet.

Impacts to habitat resulting from MPRs are summarized below:

¹ The Proof of SDG&E NCCP Accounting Letter provided to the CPUC on June 18, 2021 in compliance with MM BIO-1 disclosed that there were approximately 17.214 acres remaining in the 5-year LEHCP.

MPR	Coastal Sage Scrub (CSS)	Coast Live Oak Woodland (CLOW)	Southern Maritime Chaparral (SMC)	Habitat Impact Total
MPR-1	0.26 acre	0	0	0.26 acre
MPR-2	0.09 acre	0	0	0.09 acre
MPR-3	0.02 acre	0.02 acre	0	0.04 acre
MPR-4 (Proposed)	0.01 acre	0	0.02 acre	0.03 acre
Total:	0.38 acre	0.02 acre	0.02 acre	0.42 acre

Vegetation trimming would be required within WA 81 and WA 89. No other ground disturbing activities are anticipated within the MPR-4 work areas. No special-status species were identified within the proposed MPR-4 work areas.

According to the Project's Cultural Resources Monitoring Plan (CRMP), WA 81 is located adjacent to a cultural Environmentally Sensitive Area (ESA) and WA 89 is located within the ESA-established 100-foot buffer, but not within the known cultural resources site boundary. Exclusionary fencing is required for these ESAs adjacent to the approved work areas for Location 81 and Location 89 pursuant to the CRMP. WA 81 will not affect the placement of exclusionary fencing as shown in the CRMP. The exclusionary fencing at Location 89 was intended to be installed along the shoulder of the existing access road. WA 89 cannot be accessed with this placement, and the outriggers for the crane would need to be placed outside of the exclusionary fencing as shown in the CRMP. Therefore, MPR-4 is proposing the fencing be placed on the outside border of WA 89 to allow space for the crane's outriggers. Impacts to cultural resources are not anticipated to occur as a result of MPR-4 activities because no ground-disturbing activities are proposed with the exception of vegetation trimming, and cultural and Native American monitoring will take place during vegetation trimming. Wooden mats would be placed under the outriggers for added protection (See **Attachment C, MPR-4 Site Photographs** for example). Following vegetation trimming, cultural monitoring will occur at the discretion of the Project's Qualified Archaeologist and Native American monitoring will occur at the discretion of the Tribe. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-4 work areas are located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process, and within existing 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 analyzed within the CPUC-conducted CEQA review process. A pre-construction survey was conducted for the MPR-4 work areas on October 22, 2021. Consistent with Appendix E of the IS/MND, CSS is present within the proposed MPR-4 work area, WA 81, and SMC is present within WA 89. The Project biologist verified that the current condition is consistent with the results provided in previous biological studies (CSS and SMC). There were no special-status plant or animal species observed during the pre-construction survey. Biological monitoring will take place during vegetation trimming in accordance with APM BIO-8.</p>			

Cultural	<input type="checkbox"/> No Resources Present <input type="checkbox"/> N/A, changes would not affect resources	<input checked="" type="checkbox"/> Resources Present	
<p>Previous Cultural Survey Report Reference: Cultural resources within the Project's study area (including the MPR-4 work areas) were studied, reviewed, and documented as part of the Project's PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's IS/MND, Section 3.5). WA 81 is located adjacent to a cultural ESA and WA 89 is located within a cultural ESA. Pedestrian surveys were completed for the Project's study area in February 2015, and cultural ESAs were confirmed to be present in the vicinity of both Location 81 and Location 89. Pre-construction surveys were conducted within the access roads near Locations 81 and 89 in October 2021 in compliance with MM CUL-6. An additional close-interval pre-construction survey was performed on December 1, 2021 which encompassed WA 89 and confirmed there are no known cultural artifacts within WA 89. Cultural and Native American monitoring will occur in accordance with the CRMP as described in the Cultural Resources section below.</p>			
<p><u>Disturbance Acreage Changes:</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>			
<p>WA 81 Original disturbance acreage: The existing work area for Location 81 is approximately 2,817 square feet (0.06 acre). New disturbance acreage: The proposed WA 81 would be approximately 433 square feet (0.01 acre) in addition to the original disturbance for a total work area of approximately 3,250 square feet (0.07 acre).</p>			
<p>WA 89 Original disturbance acreage: The existing work area for Location 89 is approximately 2,311 square feet (0.05 acre). New disturbance acreage: The proposed WA 89 would be approximately 750 square feet (0.02 acre) in addition to the original disturbance for a total work area of 3,061 square feet (0.07 acre).</p>			

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-4 does not involve the installation of any new facilities or performance of any new construction activities. Vegetation trimming will occur to a height of 4 inches above the ground within WA 81 and WA 89. No other ground disturbance is anticipated within the MPR-4 work areas. Accordingly, utilization of the MPR-4 temporary work areas 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-4 temporary work areas, the sites will be stabilized in accordance with the SWPPP. In addition, the proposed MPR-4 work areas are not located in a paleontologically sensitive
	<input checked="" type="checkbox"/> N	




		area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP).
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 temporary work areas 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-4 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work areas 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. In addition, all activities will be performed in accordance with the Project's Health and Safety Plan (APM HAZ-1).
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 temporary work areas 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 MPR-4 temporary work areas 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 that would be affected by the proposed MPR-4 work areas. In addition, limiting vegetation trimming to no less than 4 inches and keeping the root structure intact reduces the likelihood of erosion within the MPR-4 work areas.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 temporary work areas 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 WA 81 is located adjacent to a cultural ESA and WA 89 is located within a cultural ESA. Exclusionary fencing is required for the cultural ESAs adjacent to the approved work areas for Location 81 and Location 89 pursuant to the CRMP. WA 81 will not affect the placement of exclusionary fencing as shown in the CRMP. The exclusionary fencing at Location 89 was intended to be installed along the shoulder of the existing access road. WA 89 cannot be accessed with this placement, and the outriggers for the crane would need to be placed outside of the exclusionary fencing as shown in the CRMP. Therefore, MPR-4 is proposing the fencing be placed on the outside border of WA 89 to allow space for the crane's outriggers. A close-interval pre-construction survey was conducted on December 1, 2021, which encompassed WA 89. No cultural artifacts were discovered within WA 89, and it was confirmed that the proposed work area is located within the ESA-established 100-foot buffer, but not within the actual site boundary.
	<input type="checkbox"/> N	

		<p>Vegetation trimming will take place within WA 81 and WA 89 and will be cut to 4 inches where trimming is required. Trimming would be performed using hand tools such as loppers and weed whackers within the MPR-4 work areas. Impacts to cultural resources are not anticipated to occur as a result of MPR-4 activities because no ground-disturbing activities are proposed with the exception of vegetation trimming, and cultural monitoring will take place during vegetation trimming. Wooden mats would be placed under the outriggers for added protection (See Attachment C, MPR-4 Site Photographs for example). Following vegetation trimming, cultural monitoring will occur at the discretion of the Project's Qualified Archaeologist.</p> <p>Although the MPR-4 work areas are in close proximity to cultural ESAs, there are no known cultural artifacts within the proposed work areas. In addition, the Cultural Resources impact analysis in the IS/MND accounted for Project staging areas, guard structures, tower installation sites, stringing sites and access roads to overlap with existing cultural ESAs, and concluded impacts would be less than significant with mitigation including training and monitoring implemented in accordance with the CRMP. Therefore, Project impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5. All activities within the MPR-4 work areas would be performed in accordance with the CRMP.</p>
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 work areas 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	Review of the Project's previous cultural resources survey reports prepared for the PEA determined WA 81 is located adjacent to an ESA and WA 89 is located within an ESA. Native American monitoring would take place during vegetation trimming activities in accordance with the CRMP. Following vegetation trimming, Native American monitoring would occur at the discretion of the Tribe. 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-4 work areas 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	Utilization of the MPR-4 temporary work areas would not affect traffic and circulation in a manner different from the impacts assessed as part of the Project's IS/MND, Section 3.17. The use of the MPR-4 work areas would not require traffic control and would not affect traffic on public roads. There are no new activities proposed, extension in work schedule, or increase in equipment or personnel required as a result of MPR-4 approval that would not be accounted for in the IS/MND and NTP-1.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 temporary work areas 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-4 temporary work areas 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 construction activities or equipment proposed as part of this MPR-4 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-4 work areas. These requirements include but are not limited to limiting vehicle speed to 15 miles per hour on work sites, regular watering of work sites to mitigate fugitive dust (NCCP Section 7.1 Operational Protocol No. 39) and restrictions on fugitive dust and air quality found in the San Diego Air Pollution Control District (SDAPCD) Regulation IV.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 temporary work areas 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-4 work areas 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-4 request, and the proposed MPR-4 work areas are not within 100 feet of a sensitive receptor. All activities performed within the proposed MPR-4 work areas would take place in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP).
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-4 temporary work areas 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-4 work areas. The proposed MPR-4 work areas would result in minor vegetation trimming within WA 81 and WA 89, however, the MPR-4 temporary work areas are 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-4 work areas 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-4 temporary work areas would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	The proposed MPR-4 work areas would result in impacts to CSS and SMC (See Attachment C, MPR-4 Site Photographs). Please see the table in the Environmental Impacts Section above for impacts per work area. Vegetation trimming will be required within

	<input type="checkbox"/> N	<p>WA 81 and WA 89 to create sufficient workspace to perform Segment 3 reconductoring activities. Trimming will be performed by hand using loppers, weed whackers and/or similar hand tools. Vegetation would be trimmed to no less than 4 inches above the ground per the SDG&E NCCP Operational Protocol No. 36 (Section 7.1) to maintain the root structure and seed bank. Wooden mats would be placed under the outriggers which would offer added protection (See Attachment C, MPR-4 Site Photographs for example). The impacts to SMC would be mitigated through the NCCP Enhancement and Monitoring Program and would not cause the available acreage in the LE-HCP to be exceeded (See Environmental Impacts Section). The impacts to CSS would not require mitigation as impacts are less than 500 square feet.</p> <p>The use of the MPR-4 temporary work areas 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-4 work areas per APM BIO-8. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-4 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
Agency Consultation?	<input type="checkbox"/> Y	The MPR-4 temporary work areas would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	As stated within the IS/MND, the area in which the MPR-4 work areas are located is within a CPUC Tier 2 High Fire Threat District (HFTD). There are no new activities proposed, extension in work schedule, or increase in equipment or personnel required as a result of MPR-4. SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention Plan, including restrictions and requirements for vegetation trimming. Therefore, the proposed MPR-4 work areas would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to wildfire that were already analyzed in the Project's IS/MND, Section 3.20.
	<input checked="" type="checkbox"/> N	

Agency Consultation	<input type="checkbox"/> Y	The MPR-4 temporary work areas 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	12/21/2021	Melinda Kimble		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	12/21/2021	William Yee		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	12/21/2021	Trevor Pratt		<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input checked="" type="checkbox"/> Refinement Approved		<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority

Conditions of Approval or Reason for Denial:

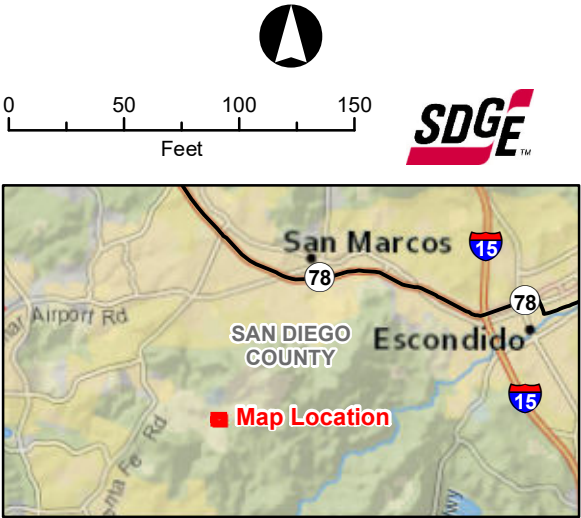
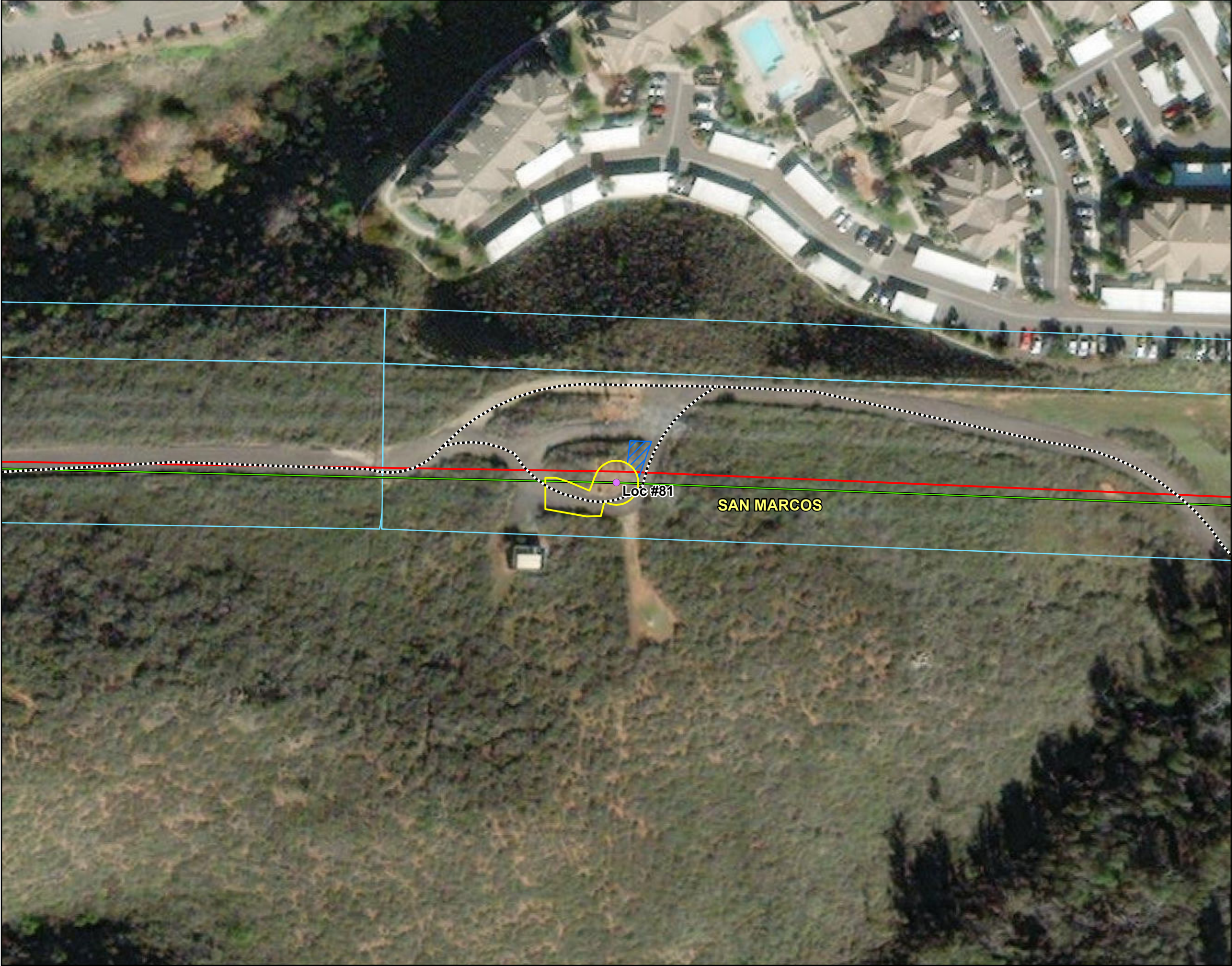
Prepared by:

Date:

ATTACHMENT B
MPR-4 Figure

TL6975 SAN MARCOS
to ESCONDIDO PROJECT
MPR-4 Figure 1
Structure Location 81
San Diego County, CA

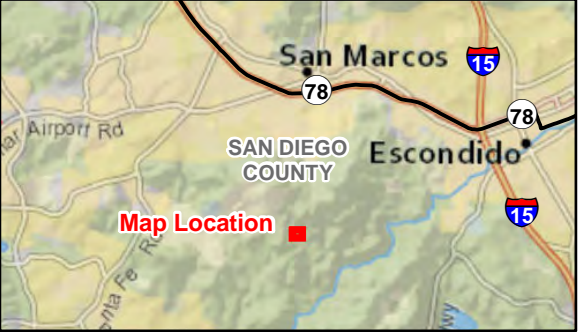
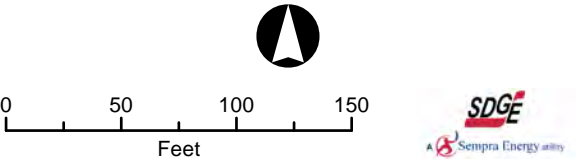
- LEGEND**
- Existing 138kV Transmission Line
 - State Highway
 - Proposed Project**
 - Overhead Work
 - Segment 3 - Reconductor / Re-energize
 - Existing Access Road
 - Temporary Work Area or Grading Impacts
 - Existing ROW
 - MPR-4 Component**
 - Additional Temporary Work Area



TL6975 SAN MARCOS
to ESCONDIDO PROJECT
MPR-4 Figure 2
Structure Location 89
San Diego County, CA

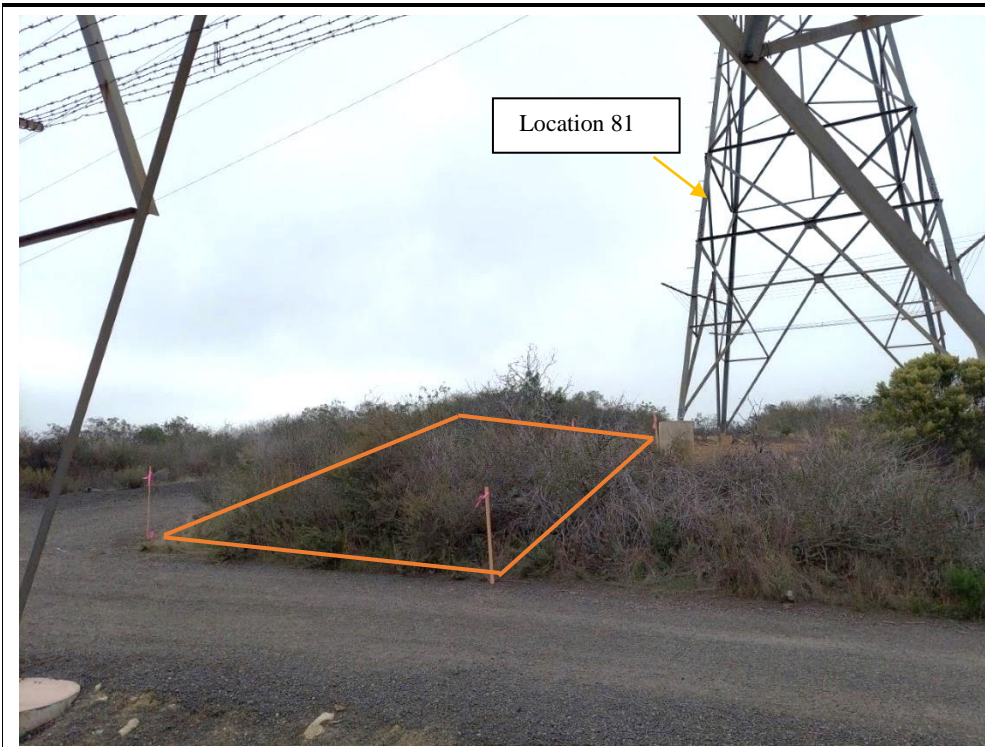
LEGEND

- Existing 138kV Transmission Line
- State Highway
- Proposed Project**
 - Overhead Work
 - Segment 3 - Reconductor / Re-energize
 - Existing Access Road
 - Temporary Work Area or Grading Impacts
 - Existing ROW
- MPR-4 Component**
 - Additional Temporary Work Area



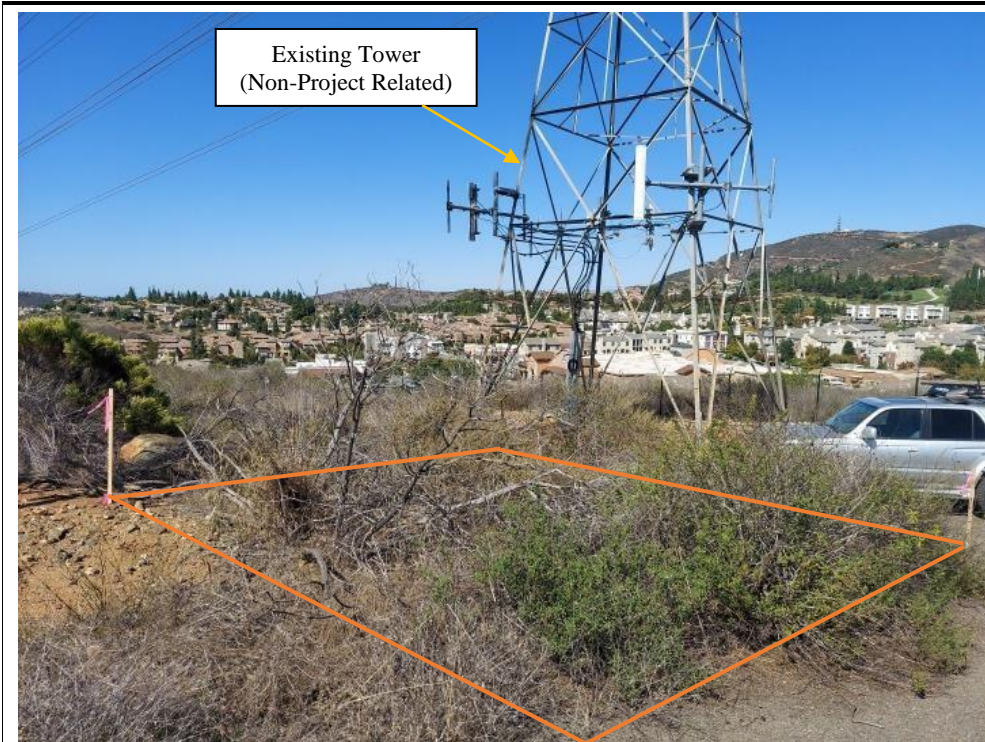
ATTACHMENT C
MPR-4 Site Photographs

MPR-4 PHOTO LOG



Photograph 1:

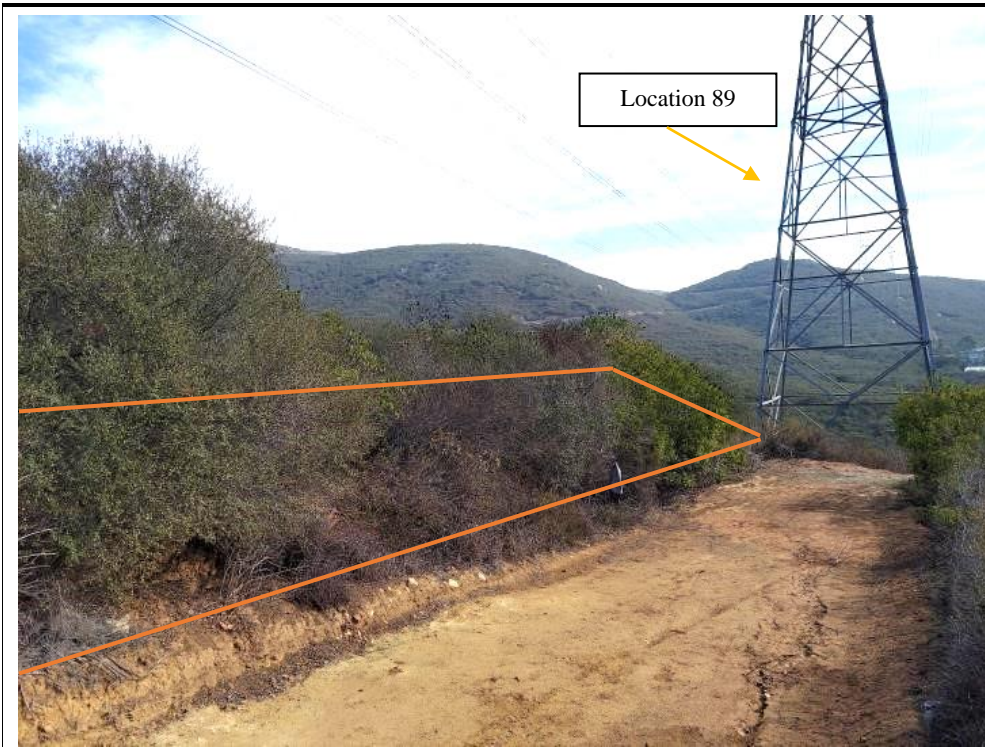
View of the approximate location of the additional work area near Location 81 (WA 81) outlined in orange. Facing: S



Photograph 2:

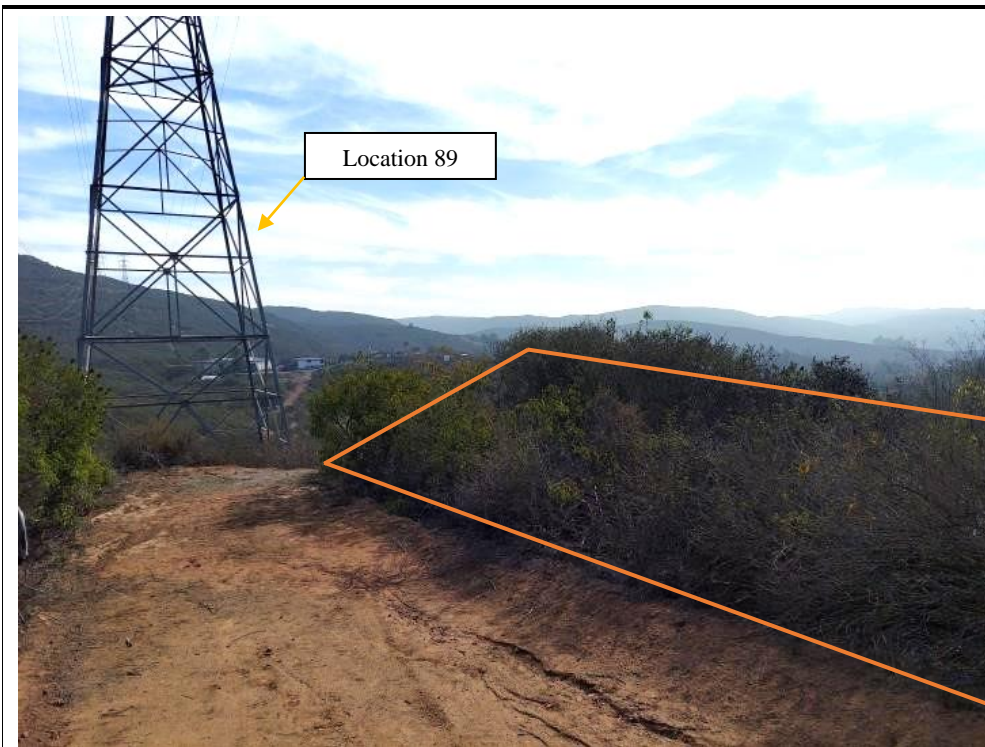
View of the approximate location of the additional work area near Location 81 (WA 81) outlined in orange. Facing: NW

MPR-4 PHOTO LOG



Photograph 3:

View of the approximate location of the northern portion of the additional work area near Location 89 (WA 89) outlined in orange. Facing: NE



Photograph 4:

View of the approximate location of the southern portion of the additional work area near Location 89 (WA 89) outlined in orange. Facing: SE

MPR-4 PHOTO LOG



Photograph 5:

Example photo of crane outrigger on a wooden mat, similar to matting that would be used at WA 89 – for reference only.