



William Yee
TL6975 Environmental Project Manager
San Diego Gas & Electric Company
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January 20, 2022

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

Re: Minor Project Refinement No. 6 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. 6 (MPR-6) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-6 will authorize the relocation of Location 78 and its associated work area to facilitate wire installation operations associated with Segment 3 of the Project. The MPR-6 work area is located entirely within the transmission right-of-way (ROW). The requested additional work area will total approximately 6,090 square feet, or 0.14 acre. Please refer to **Attachment B, MPR-6 Figure** and **Attachment C, MPR-6 Site Photographs** to view the MPR-6 work area.

Attachment A: MPR-6 Form

Attachment B: MPR-6 Figure

Attachment C: MPR-6 Site Photographs

Attachment D: Habitat Modification Accounting

Description of MPR-6 Workspace and Activities

As stated above, SDG&E is requesting approval of MPR-6 for the relocation of Location 78 and its associated work area to facilitate wire installation operations associated with Segment 3 of the TL6975 San Marcos to Escondido Project (Project). Following the approval of Notice to Proceed No. 1 (NTP-1), it was discovered that a non-Project related structure was installed in place of Location 78, resulting in the overhead alignment in this junction to be reconfigured.

Grubbing of vegetation and grading will be required within the MPR-6 permanent impact area in order to create a level construction work area and work pad. Grubbing and grading would be performed with a dozer, backhoe or similar equipment. Vegetation trimming will also take place within the temporary portion of the MPR-6 work area. Vegetation trimming would be completed

with both hand tools and a skid steer with a mower deck and 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).

The MPR-6 work area would be accessed from the existing access road entrance off San Elijo Road. The non-jurisdictional concrete v-ditch drainage that runs parallel to the MPR-6 work area will be protected by trench plates and Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs) during construction. A concrete brow ditch will be installed on the upslope of the work pad to allow for proper drainage and it would tie into the existing non-jurisdictional concrete v-ditch. The work pad would consist of compacted Class 2 base. A Grading Permit (or Grading Permit addendum) issued by the City of San Marcos would include the grading and design of the work pad and brow ditch feature within the permanent portion of the MPR-6 work area. A copy of the Grading Permit would be provided to the CPUC prior to starting any activities covered under the permit in accordance with Section 2.0 of the Mitigation Monitoring, Reporting and Compliance Program (MMRCP). In accordance with the SWPPP, the temporary disturbance associated with the MPR-6 work area will be stabilized with a native seed mix.

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 MMRCP pre-construction requirements described in NTP-1. A Grading Permit (or Grading Permit addendum) will be acquired from the City of San Marcos in order to perform grading at Location 78. As required in Section 2.0 of the MMRCP, all permits received will be submitted to the CPUC prior to the commencement of permitted activities.

MPR-6 Request for Approval

SDG&E respectfully requests approval of MPR-6 for the relocation of Location 78 and its associated work area by February 1, 2022. MPR-6 activities would take place in accordance with conditions outlined in the CPUC's NTP-1 approval letter, as well as requirements in the IS/MND and MMRCP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at wye@sdge.com.

Sincerely,



William Yee
TL6975 Environmental Project Manager

cc: Dave Davis, ESA Associates
Melinda Kimble, SDG&E

Josh Taylor, KP Environmental

ATTACHMENT A
MPR-6 Form



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

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

Date Requested: January 20, 2022

Report No.: 6

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 6 (MPR-6) work area is located entirely within SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-6 work area is located in the City of San Marcos north of San Elijo Road.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-6 work area is estimated as follows:

- 6,090 square feet (0.14 acre) in coastal sage scrub (CSS), disturbed and bare ground.

Sensitive Resources: There is CSS present within the MPR-6 work area. See resource discussions below.

Modification From:

<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other:		

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-6 for the relocation of Location 78 and its associated work area to facilitate wire installation operations associated with Segment 3 of the TL6975 San Marcos to Escondido Project (Project). Following the approval of Notice to Proceed No. 1 (NTP-1), it was discovered that a non-Project related structure was installed in place of Location 78, resulting in the overhead alignment in this junction to be reconfigured. See **Attachment B, MPR-6 Figure** and **Attachment C, MPR-6 Site Photographs**, for an overview of the proposed MPR-6 work area.

Grubbing of vegetation and grading will be required within the MPR-6 permanent impact area in order to create a level construction work area and work pad. Grubbing and grading would be performed with a dozer, backhoe or similar equipment. Vegetation trimming will also take place within the temporary portion of the MPR-6 work area. Vegetation trimming would be completed with both hand tools and a skid steer with a mower deck and 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).

The MPR-6 work area would be accessed from the existing access road entrance off San Elijo Road. The non-jurisdictional concrete v-ditch drainage that runs parallel to the MPR-6 work area will be protected by trench plates and Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs) during construction. A concrete brow ditch will be installed on the upslope of the work pad to allow for proper drainage and it would tie into the existing non-jurisdictional concrete v-ditch. The work pad would consist of compacted Class 2 base. A Grading Permit (or Grading Permit addendum) issued by the City of San Marcos would include the grading and design of the work pad and brow ditch feature within the permanent portion of the MPR-6 work area. A copy of the Grading Permit would be provided to the CPUC prior to starting any activities covered under the permit in accordance with Section 2.0 of the Mitigation Monitoring, Reporting and Compliance Program (MMRCP). In accordance with the SWPPP, the temporary disturbance associated with the MPR-6 work area will be stabilized with a native seed mix.

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

Original Condition: The MPR-6 work area is located within the geographic study area of the IS/MND and is adjacent to approved work areas, therefore it has been previously analyzed. Since the Project was originally designed, a non-Project related structure was installed in the original position of Location 78, which resulted in the relocation of Location 78.

Justification for Change:

Following the approval of NTP-1, it was discovered that a regulator station was installed in the location where Location 78 was originally approved, which resulted in the reconfiguration of the overhead alignment and the relocation of Location 78. Grading will be required to create a level construction work area and permanent work pad for the new position of Location 78. In addition, a concrete brow ditch will be installed to ensure proper drainage and will connect to the existing concrete v-ditch.

Location 78 must be installed and the associated overhead distribution line must be reconfigured before the Segment 3 reconductoring can occur between Locations 70 and 85. This makes Location 78 a critical component of Segment 3 activities.

Maps & Figure: Refer to **Attachment B, MPR-6 Figure**, for a map of the proposed MPR-6 work area. Refer to **Attachment C, MPR-6 Site Photographs**, for pictures of the current conditions of the MPR-6 work area.

Environmental Impact: Utilization of the MPR-6 work area 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 an additional discretionary approval by the CPUC. No special-status species were identified within the proposed MPR-6 work area.

Impacts to type of land cover resulting from MPR-6 are estimated in the table below:

	Coastal Sage Scrub	Disturbed Habitat	Bare Ground
Temporary	268 sf	1,072 sf	0 sf
Permanent	2,850 sf	1,663 sf	237 sf
Total:	3,118 sf (0.07 acre)	2,735 sf (0.06 acre)	237 sf (>0.01 acre)

Location 78 will be replacing the existing direct-bury distribution pole No. 131 with a new direct-bury distribution pole. Per Table 7.4 in the NCCP/LE-HCP, permanent impacts resulting from maintenance of existing facilities and occurring within a Preserve would be mitigated at a 2:1 ratio. Therefore, the 2,850 square feet of permanent impacts to coastal sage scrub (CSS) would require 5,700 square feet of credit drawdown from the SDG&E mitigation bank. As the temporary impacts to CSS are 268 square feet and therefore less than 500 square feet, they would be mitigated per Table 7.4 (b), and success criteria would not be required (SDG&E NCCP; Pages 111 & 122). SDG&E will assess all final impacts in a Post Construction Report to determine appropriate mitigation as prescribed by Table 7.4 in the NCCP.

Attachment D, Habitat Modification Accounting, documents the deductions of “take” credits from the amount set aside when the Project was approved. A total of 0.53 acres of impacts have been deducted for MPRs 1-5 and proposed MPR-6, and 13.684 acres of take credits are remaining. Therefore, MPR-6 impacts would not cause the available acreage to be exceeded.

According to the Project’s Cultural Resources Monitoring Plan (CRMP), the proposed MPR-6 work area is within an area determined to have a high potential for buried archaeological deposits. However, MPR-6 activities would not substantially increase the severity of impacts to cultural resources as ground disturbance was already anticipated in the vicinity of the work area (Location 78 was moved approximately 85 feet). Cultural and Native American monitoring will occur within the MPR-6 work area during vegetation trimming and ground disturbing activities such as grading. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-6 work area is located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<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:</p> <p>Biological resources along the Project alignment were studied, reviewed, and documented as part of the TL6975 Project’s Proponent’s Environmental Assessment (PEA). Biological Resources were also analyzed within the CPUC-conducted CEQA review process. A pre-construction survey was conducted for the MPR-6 work areas on December 28, 2021. Consistent with Appendix E of the IS/MND, CSS is present within the proposed MPR-6 work area. The Project biologist verified that the current condition is consistent with the results provided in previous biological studies. There were no special-status plant or animal species observed during the pre-construction survey. Biological monitoring will take place during vegetation trimming, grubbing and ground-disturbing activities in accordance with APM BIO-8.</p>			
Cultural	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
<p>Previous Cultural Survey Report Reference:</p> <p>Cultural resources within the Project’s study area (including the MPR-6 work area) were studied, reviewed, and documented as part of the Project’s PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project’s IS/MND, Section 3.5). Pedestrian surveys were completed for the Project’s study area in February 2015</p>			

for the PEA. There are no known sensitive cultural resources within the MPR-6 work area and no cultural resources were recorded during the pedestrian survey. The MPR-6 work area is located in an area determined to have a high potential for archaeological deposits. There is also a cultural Environmentally Sensitive Area (ESA) southeast of the MPR-6 work area, on the opposite side of San Elijo Road. Therefore, cultural and Native American monitoring will take place for vegetation trimming, grubbing and ground-disturbing activities in accordance with the CRMP.

Disturbance Acreage Changes: ☒ Yes ☐ No

MPR-6 would result in 1,340 square feet in temporary impacts and 4,750 square feet of permanent impact resulting in a total of 6,090 square feet (0.14 acre) of additional disturbance to the Project as approved.

It should be noted, the total size of the permanent disturbance area associated with Location 78 is 6,023 square feet; however, the permanent work area for the original Location 78 (1,273 sf) was deducted as to not double-count overlapping impacts. Therefore, the proposed MPR-6 permanent work area would result in a new permanent impact of 4,750 square feet. The temporary impacts proposed in MPR-6 do not overlap with the original temporary impacts for Location 78.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Location 78 (Original)	2,012 sf	1,273 sf	3,285 sf (0.08 acre)
Location 78 (New in MPR-6)	1,340 sf	4,750 sf	6,090 sf (0.14 acre)

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, Seismicity, Paleontological Resources	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>Although MPR-6 would involve additional ground disturbance, the ground-disturbing activities for Location 78 analyzed and approved in the IS/MND and NTP-1, (direct-bury pole installation, grading for pad) will still take place in approximately the same area. For this reason and the reasons described below, MPR-6 activities are not expected to result in new significant impacts or a substantial increase in severity of any previously identified impacts to geology, soils, or paleontological resources analyzed in the Project's IS/MND, Section 3.7.</p> <p>As stated in Section 3.7.1 of the IS/MND, Segment 3 has a general susceptibility for landslides as the topography of the region has areas of varying slope. However, WA 78 is located in an area that is relatively flat and is not anticipated to contribute to the risk of landslides. Vegetation trimming within the temporary portion of the MPR-6 work area would occur to a height of 4 inches above the ground. Therefore, the root system would contribute to stabilizing the soil.</p>

		<p>Grubbing and clearing of vegetation would occur within the permanent impact area of 4,750 square feet for Location 78. Grading will also take place as part of the construction of the permanent work pad. Erosion control BMPs would be incorporated in accordance with the SWPPP and the Erosion Control Plan attached to the Grading Permit. Because Segment 3 is characterized by factors such as corrosive soils and varying slope, a supplemental Geotechnical Report was required by MM GEO-1, which was approved by the CPUC on May 18, 2021. The design recommendations for Location 78 contained in the supplemental report would be implemented and would still apply due to Location 78 being located in the same general area with similar geologic conditions, approximately 85 feet from the original location of the pole. In addition, the proposed MPR-6 work area is not located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP). In addition, a concrete brow ditch would be installed on the upslope side of the work pad to allow proper drainage and prevent erosion and siltation.</p> <p>Accordingly, MPR-6 would not create any new geologically-related hazard not previously disclosed in the Project's IS/MND, Section 3.7. Following the use of the MPR-6 work area, the site will be stabilized in accordance with the SWPPP.</p>
Agency Consultation?	<input checked="" type="checkbox"/> Y	A Grading Permit issued by the City of San Marcos will be required prior to performing any earth-moving work within the MPR-6 permanent work area.
	<input type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	<p>There are no new facilities or significantly different activities being proposed in MPR-6 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-6 work area would not require any new potentially hazardous materials to be used and would not create any new hazardous waste that could expose the public to hazards not previously disclosed in the Project's IS/MND. All activities will be performed in accordance with the Project's Health and Safety Plan (APM HAZ-1) as well as the Soil and Dewatering Management Plan (MM HAZ-1).</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input checked="" type="checkbox"/> Y	<p>There is a concrete v-ditch drainage that runs parallel to the MPR-6 work area. The drainage ditch would be protected by trench plates and SWPPP BMPs as-needed during construction activities. The drainage is non-jurisdictional, and no jurisdictional aquatic resources would be impacted by MPR-6 activities.</p> <p>A concrete brow ditch would be installed on the upslope side of the work pad to allow proper drainage and prevent erosion and siltation (See Attachment B, MPR-6 Figure). The brow ditch would connect to the existing concrete v-ditch. The work pad would be constructed of compacted Class 2 base to allow for permeation into the soil. This would not impede or redirect flood flow, conflict with any local water</p>
	<input type="checkbox"/> N	

		<p>quality control plans or otherwise 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.</p> <p>Limiting vegetation trimming to no less than 4 inches within the temporary impact area and keeping the root structure intact would also reduce the likelihood of erosion within the MPR-6 work area.</p>
Agency Consultation?	<input checked="" type="checkbox"/> Y	A Grading Permit issued by the City of San Marcos will be required prior to installing the brow ditch feature.
	<input type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	<p>Vegetation trimming will take place within the temporary portions of the MPR-6 work areas, and will be cut to 4 inches. The permanent portion of the Location 78 work area will be grubbed and graded prior to the start of the direct-bury pole installation at Location 78.</p>
	<input type="checkbox"/> N	<p>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-6 work area. However, the MPR-6 work area is located within an area determined to have a high potential for archaeological deposits. There is also a cultural ESA southeast of the MPR-6 work areas, on the opposite side of San Elijo Road. Therefore, cultural monitoring would take place during vegetation trimming and ground-disturbing activities pursuant to the CRMP. Project impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5.</p>
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 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	<p>As stated in the previous section, there are no known sensitive cultural resources (including tribal cultural resources) within the MPR-6 work area. However, the proposed MPR-6 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 and ground disturbing activities in accordance with the CRMP. Impacts would be similar to those disclosed within the Project's IS/MND, Section 3.18.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 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	<p>The relocation of Location 78 and its work area would not require traffic control and would not affect traffic control on public roads. MPR-6 activities would not involve a schedule extension or significantly different construction activities or equipment that would create a change to the number of construction-related trips on local roadways that would not be accounted for in the IS/MND, Section 3.17 and NTP-1.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	

Air Quality	<input type="checkbox"/> Y	MPR-6 would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's IS/MND, Section 3.3, as there is no new construction equipment or significantly different activities proposed as part of this MPR-6 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-6 work area. 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. Therefore, MPR-6 would not affect air quality or emissions in a manner substantially different from the impacts assessed as part of the Project's IS/MND.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	MPR-6 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-6 request that would cause a substantial increase in construction noise, and the proposed MPR-6 work areas are not within 100 feet of a sensitive receptor. All activities performed within the proposed MPR-6 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	MPR-6 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	As described in Section 3.1 of the IS/MND, the area in which the Project is located has numerous existing above-ground electric utility components. This is also true for the junction in which Location 78 is located, where several existing utility structures are in close proximity. MPR-6 would involve an increase in the size of permanent disturbance associated with Location 78 due to its relocation; however, this change will not require removal of any landscaped or screening vegetation. The overall visual sensitivity to this adjustment would be low and would not be expected to result in a substantial impact to the existing visual character or quality of public views beyond what was analyzed in the IS/MND, Section 3.1. In addition, the MPR-6 work area is not located within a Key Observation Point (KOP), scenic vista, or other scenic resource identified in the IS/MND. Therefore, MPR-6 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 type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	

Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>MPR-6 would result in 3,118 square feet of impacts to CSS. Vegetation trimming will be required within the temporary portion of the MPR-6 work area. Trimming will be performed with both hand tools and a skid steer with a mower deck and 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. The vegetation within the permanent portion of the MPR-6 work area will be grubbed using a dozer, backhoe or similar equipment.</p> <p>Location 78 will be replacing the existing direct-bury distribution pole No. 131 with a new direct-bury distribution pole. Per Table 7.4 in the NCCP/LE-HCP, permanent impacts resulting from maintenance of existing facilities and occurring within a Preserve would be mitigated at a 2:1 ratio. Therefore, the 2,850 square feet of permanent impacts to CSS would require 5,700 square feet of credit drawdown from the SDG&E mitigation bank. As the temporary impacts to CSS are 268 square feet and therefore less than 500 square feet, they would be mitigated per Table 7.4 (b), and success criteria would not be required (SDG&E NCCP; Pages 111 & 122).</p> <p>Attachment D, Habitat Modification Accounting, documents the deductions of “take” credits from the amount set aside when the Project was approved. A total of 0.53 acres of impacts have been deducted for MPRs 1-5 and proposed MPR-6, and 13.684 acres of take credits are remaining. Therefore, MPR-6 impacts would not cause the available acreage to be exceeded.</p> <p>MPR-6 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, grubbing and ground-disturbing activities 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-6 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	MPR-6 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-6 work area is located within a CPUC Tier 2 High Fire Threat District (HFTD). There are no significantly new activities proposed, extension in work schedule, or increase in equipment or personnel required as a result of MPR-6. 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 and grubbing. Therefore, MPR-6 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to wildfire that were already analyzed in the Project's IS/MND, Section 3.20.
	<input checked="" type="checkbox"/> N	
Agency Consultation	<input type="checkbox"/> Y	MPR-6 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

Conditions of Approval or Reason for Denial:

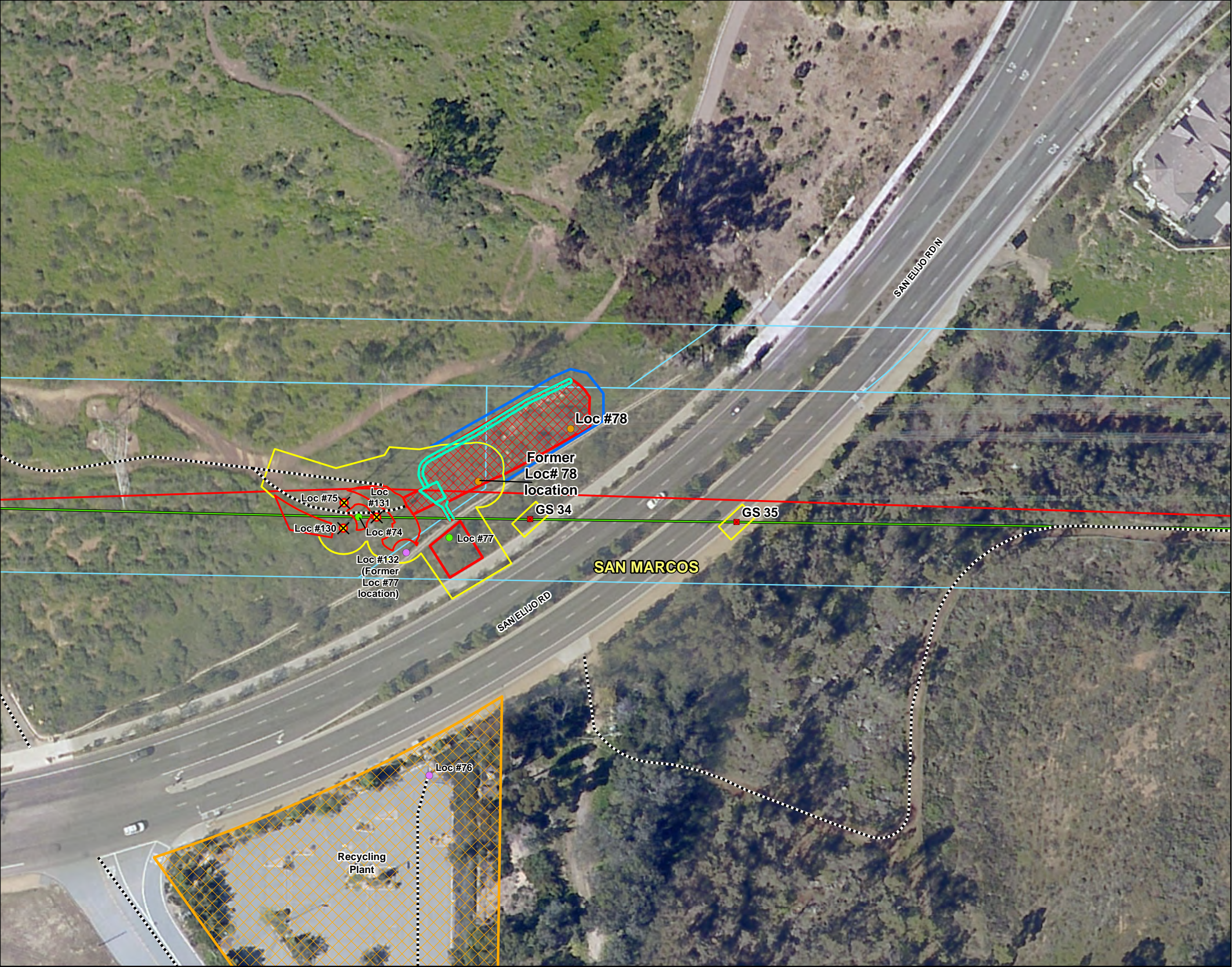
Prepared by:

Date:

ATTACHMENT B
MPR-6 Figure

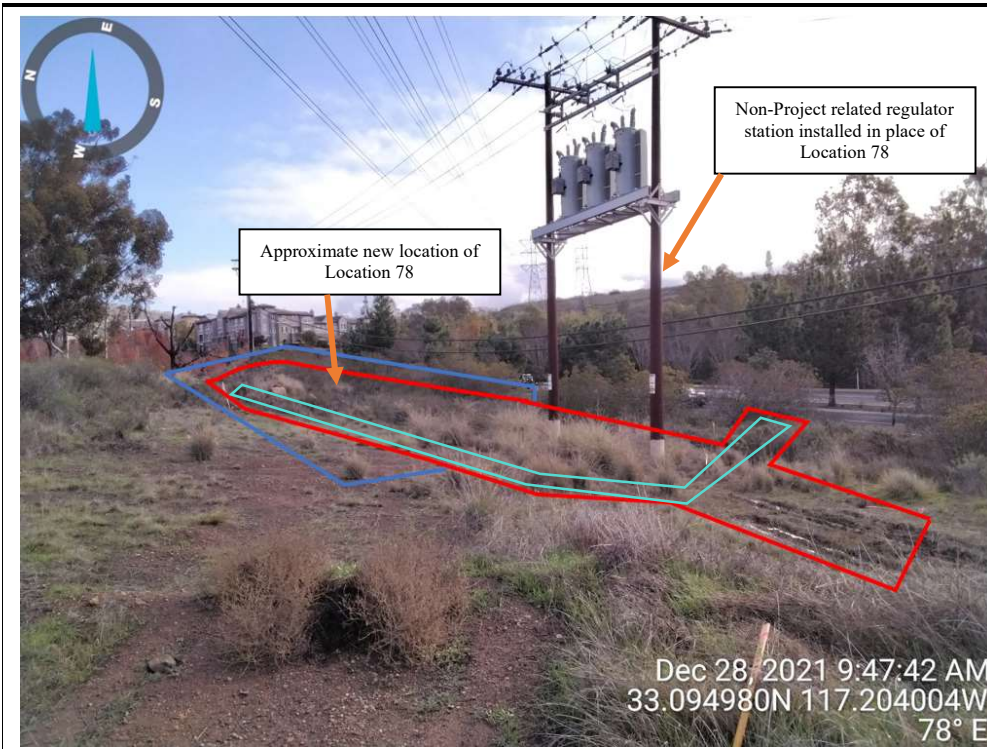
TL6975 SAN MARCOS
to ESCONDIDO PROJECT
MPR-6 Figure 1
Structure Location 78
San Diego County, CA

- LEGEND**
- Existing 138kV Transmission Line
 - State Highway
 - Proposed Project**
 - Replace Existing with Pier Foundation
 - Replace Existing with Direct Bury
 - Overhead Work
 - Remove From Service
 - Guard Structures
 - Segment 3 - Reconductor / Re-energize
 - Existing Access Road
 - Temporary Work Area
 - Permanent Work Area or Grading Impacts
 - Staging Yard
 - Existing ROW
 - MPR-6 Component**
 - Additional Permanent Work Area
 - Additional Temporary Work Area
 - Additional Permanent Brow Ditch



ATTACHMENT C
MPR-6 Site Photographs

MPR-6 PHOTO LOG



Photograph 1:

View of the MPR-6 temporary work area in dark blue, permanent work area in red and the approximate location of the brow ditch feature in teal. Facing: E



Photograph 2:

View of the MPR-6 temporary work area in dark blue, permanent work area in red and the approximate location of the brow ditch feature in teal. Facing: NE

MPR-6 PHOTO LOG



Photograph 3:

View of the MPR-6 temporary work area in dark blue, permanent work area in red and the approximate location of the brow ditch feature in teal. Facing: S

ATTACHMENT D
Habitat Modification Accounting



TO: Trevor Pratt
FROM: William Yee

DATE: January 19, 2022

SUBJECT: Attachment D to MPR-6: Habitat Modification Accounting (take credits/mitigation)

This memo includes a table and summary of the estimated acreage of habitat to be modified during the construction of the TL6975 San Marcos to Escondido Project (Project). The table below provides the Project impacts to habitat as estimated (in gray) under “Project as approved” and the impacts to habitat resulting from or being proposed in the Minor Project Refinements (MPRs). As we continue to request MPRs for approval, we will be adding to this table and adjusting the totals.

Under the authorization of the 5-year Low Effect Habitat Conservation Plan (LE-HCP), the accounting of all habitat modification is completed on an annual basis and the total habitat modification or “take” credit allowed is 60 acres. In compliance with MM BIO-1, SDG&E provided a letter to the CPUC as Attachment C to the Notice to Proceed No. 1 (NTP-1) on June 18, 2021. In this letter, it was documented that 17.214 acres remain in 2021 providing the requested proof that “sufficient mitigation/take credits” were available for the TL6975 Project. It was estimated in the Initial Study / Mitigated Negative Declaration (IS/MND) that 2.5 acres of habitat would be modified as a result of the TL6975 Project, but to account for unforeseen circumstances, an additional 0.5 acre was included to bring the total to three acres.

As shown in the table below, three acres were subtracted from the 17.214 acres to account for the Project’s estimated impacts. With a total of 0.53 acre of impacts resulting from MPRs thus far (including this MPR-6 Request), there would be a balance of 13.684 acres remaining of habitat to be modified or impacted under the current LE-HCP “take authorization.” Therefore, the MPR-6 impacts would not cause the available acreage to be exceeded, and thus SDG&E’s coverage for modifying habitat would remain sufficient to support the Project. It is important to note, this is only an estimate and upon conclusion of the Project, a post-construction report (PCR) will be drafted to account for the actual impacts to habitat and the total withdrawal from the credits for modifying habitat. All staging yards and work areas, regardless of whether they are being used or not, are included in the Project’s estimated impact total of three acres.

Impacts to habitat resulting from MPRs thus far are summarized below:

MPR	Coastal Sage Scrub (CSS) (Acres)	Coast Live Oak Woodland (CLOW) (Acres)	Southern Maritime Chaparral (SMC) (Acres)	Eucalyptus Woodland (Acres)	Non-native grassland (Acres)	Additional credits added for unforeseen circumstances (Acres)	Total Credits Set Aside for TL6975 (Acres)	MPR Habitat Impact Total (Acres)	Estimated Remaining Acreage (From 17.214 acres)
Project as Approved	1.6	-	0.7	0.1	0.1	0.5	3.00	-	14.214
MPR-1	0.26	-	-	-	-	-	-	0.26	13.954
MPR-2	0.09	-	-	-	-	-	-	0.09	13.864
MPR-3	0.02	0.02	-	-	-	-	-	0.04	13.824
MPR-4	0.01	-	0.02	-	-	-	-	0.03	13.794
MPR-5	0.04	-	-	-	-	-	-	0.04	13.754
MPR-6 (Proposed)	0.07	-	-	-	-	-	-	0.07	13.684
Total:	2.09	0.02	0.72	0.1	0.1	0.5	3.00	0.53	13.684