



Richard Quasarano
SOCRE Environmental Project Manager
San Diego Gas & Electric Company
(T) 858-654-8211

October 15, 2019

Andrew Barnsdale
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Minor Project Refinement No. 4 for the South Orange County Reliability Enhancement Project.

Mr. Barnsdale:

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 South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-4 will authorize the use of two staging areas on the west and east sides of Avenida La Pata in unincorporated Orange County, located on Prima Deshecha Landfill property, which is owned by Orange County Waste and Recycling (OCWR). The locations of the staging areas are slated for future landfill use, but have never previously been used for waste storage, nor is there any waste on site currently. The western staging area is approximately 2.42 acres, and the eastern staging area is approximately 2.28 acres. The proposed staging areas are adjacent to the path of the Project's new double-circuit 230-kV transmission line, just east of transmission pole #25. The staging areas will be used to facilitate the Project's transmission and distribution line construction east of Interstate 5 (I-5). Please refer to **Attachment B, MPR-4 Figure** and **Attachment C, MPR-4 Site Photographs** to view the MPR-4 staging areas.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-4 Figure
Attachment C: MPR-4 Site Photographs
Attachment D: MPR-4 Biological Review

Description of MPR-4 Workspace and Activities

As mentioned above, MPR-4 would authorize SDG&E to use two staging areas (totaling 204,731 square-feet or 4.7 acres) located on the west and east sides of Avenida La Pata, on Prima Deshecha Landfill. The alternate staging areas are necessary in order to efficiently complete Project activities associated with transmission and distribution work east of I-5. The MPR-4 staging areas are being proposed as alternatives to Staging Area 7 (2.08 acres) approved in the Final Environmental Impact Report (FEIR) (refer to Figure 2-1) which was also located on landfill property, but is no longer

anticipated to be available for Project use. The location of the staging areas was chosen due to availability from the landowner, their proximity to Project overhead and underground transmission and distribution line segments, and their size is optimal for staging the required construction materials and equipment. There will be no changes to locations of other construction components associated with the Project as a result of MPR-4. The proposed staging areas will be used for worker meetings, staging of construction trailers, parking for visitors and construction personnel, and materials and equipment storage. The staging areas may also be used as helicopter fly yards. To prepare the staging areas, vegetation will be cleared (mowing), class II base will be placed to create an even surface, fencing and screening material will be installed, and stormwater Best Management Practices such as straw wattle and rumble plates will be implemented. Minor grading may occur in order to install the entrance and exit ramps. In addition, a new entrance ramp from Avenida La Pata will be installed towards the north side of the western staging area, and an exit ramp will be constructed towards the south side of the western staging area to allow for a safer vehicle entrance and exit point. The new entrance and exit will be constructed in accordance with lease agreement and Encroachment Permit requirements. Please refer to **Attachment B** to view the proposed locations for these modifications.

The MPR-4 staging areas will be utilized for the duration of Project activities east of I-5 (approximately 3 years or when the lease agreement ends, whichever comes first). Following the use of the MPR-4 staging areas, the areas will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, Encroachment Permit requirements, applicable lease agreement requirements, and in coordination with OCWR.

Preconstruction Requirements and Permit/Approvals

An Encroachment Permit and Traffic Control Plan from Orange County will be required, as well as a lease agreement with OCWR for the use of the staging yards and associated access roads. SDG&E will submit the final Encroachment Permit and Traffic Control Plan to the CPUC for their records.

MPR-4 Request for Approval

SDG&E respectfully requests approval of MPR-4 to utilize two staging areas located on the west and east sides of Avenida La Pata, on OCWR property in unincorporated Orange County, by October 22, 2019. The staging areas will be used in accordance with Project requirements, the final Encroachment Permit and Traffic Control Plan from Orange County, and the final lease agreement with OCWR. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 654-8211 or by email at rquasarano@sdge.com.

Sincerely,



Richard Quasarano
SOCRE Environmental Project Manager

cc: Joe Donaldson, Ecology and Environment, Inc.
Jennifer Kaminsky, SDG&E Project Manager
William Bostwick, Project Coordinator
Kenda Pollio, KP Environmental

ATTACHMENT A
MPR-4 Form



South Orange County Reliability Enhancement Project CPUC Minor Project Refinement Form

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

Date Requested: October 15, 2019

Report No.: 4

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC), and an Encroachment Permit and Traffic Control Plan from Orange County will be required.

Property Owner(s): The Minor Project Refinement No. 4 (MPR-4) staging areas are owned by Orange County Waste and Recycling (OCWR).

Location/Milepost: The MPR-4 staging areas are located just east of transmission pole #25, on the west and east sides of Avenida La Pata on the Prima Deshecha Landfill, within unincorporated Orange County.

Land Use/Vegetative Cover: The entire 204,731 square-foot or 4.7-acre MPR-4 work area (including both staging areas) is located entirely within disturbed/developed habitat.

Sensitive Resources: There are no sensitive resources in the MPR-4 area. See resource discussions below.

Modification From: Permit Plan/Procedure Specification Drawing
 Mitigation Measure Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-4 for the use of two staging areas in order to facilitate transmission and distribution line construction east of Interstate 5 (I-5) for the South Orange County Reliability Enhancement Project (SOCRE or Project). The staging areas are located on the west and east sides of Avenida La Pata, in unincorporated Orange County, on the Prima Deshecha Landfill. The locations of the staging areas are slated for future landfill use, but have never previously been used for waste storage, nor is there any waste on site currently. The western staging area is 2.42 acres (105,415 square-feet), and the

eastern staging area is 2.28 acres (99,316 square-feet). Combined, the MPR-4 staging areas will total 4.7 acres.

Use of the MPR-4 staging areas is necessary to efficiently complete the transmission and distribution line work for the Project east of I-5. The staging areas are being proposed as alternatives to Staging Area 7 (2.08 acres) approved in the Final Environmental Impact Report (FEIR) (refer to Figure 2-1) which was also located on landfill property, but is no longer anticipated to be available for Project use. The location of the staging areas was chosen due to availability from the landowner, their proximity to Project overhead and underground transmission and distribution line segments, and their size is optimal for staging the required construction materials and equipment. The proposed staging areas will be used for worker meetings, staging of construction trailers, visitor and construction personnel parking, and materials and equipment storage. The staging areas may also be used as helicopter fly yards. To prepare the staging areas, vegetation will be cleared (mowing), class II base will be placed to create an even surface, fencing and screening material will be installed, and stormwater Best Management Practices (BMPs) such as straw wattle and rumble plates will be implemented. In addition, a new entrance ramp from Avenida La Pata will be installed towards the north side of the western staging area, and an exit ramp will be constructed towards the south side of the western staging area to allow for a safer vehicle entrance and exit point. The new entrance and exit will be constructed in accordance with lease agreement and Encroachment Permit requirements. Please refer to **Attachment B, MPR-4 Figure** to view the proposed locations for these modifications.

A lease agreement with OCWR will be required in addition to an Encroachment Permit and Traffic Control Plan from Orange County. SDG&E will submit the final Encroachment Permit and Traffic Control Plan to the CPUC for their records. The MPR-4 staging areas will be utilized for the duration of transmission and distribution work east of I-5 (approximately 3 years or when the lease agreement ends, whichever comes first). Following the use of the MPR-4 staging areas, the areas will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, Encroachment Permit requirements, applicable lease agreement requirements, and in coordination with OCWR. Preparation work within the MPR-4 staging areas is scheduled to begin as early as October 2019. **Attachment B, MPR-4 Figure** shows the location of the proposed MPR-4 staging areas.

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

Original Condition: The Project's FEIR did not identify the need for additional staging areas in the location of the proposed MPR-4 staging areas to complete the Project's transmission and distribution work east of I-5. Therefore, the original condition of the MPR-4 staging areas was not evaluated in any previous document or report.

Justification for Change: Since Staging Area 7 (FEIR, Figure 2-1) will likely no longer be available for Project use, SDG&E identified the need to gain access to the alternative MPR-4 staging areas in order to facilitate the Project's transmission and distribution work east of I-5. Although the proposed MPR-4 staging areas have a greater acreage than Staging Area 7 (4.7 acres versus 2.08 acres), it is anticipated that if approved, the MPR-4 staging areas would serve as the primary staging areas for Project construction east of I-5, and most (if not all) other staging areas identified in the FEIR would not need to be utilized. Therefore, overall temporary impacts estimated for staging areas in the FEIR would not be increased due to the utilization of the MPR-4 staging areas.

Maps & Figures: Refer to **Attachment B, MPR-4 Figure**, for a map of the proposed MPR-4 staging area locations. Refer to **Attachment C, MPR-4 Site Photographs**, for pictures of the current condition of the MPR-4 staging areas.

Environmental Impact: Utilization of the MPR-4 staging areas to facilitate Project transmission and distribution construction activities east of I-5 would not change the nature or increase the severity of any impacts disclosed within the FEIR; 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 discretionary permits or new regulatory approval. However, a lease agreement from OCWR would be required for use of the MPR-4 staging areas and associated access roads, as well as an Encroachment Permit and Traffic Control Plan from Orange County. Additionally, new construction entrance and exit ramps and security gates will be constructed for the western staging area as part of MPR-4 activities. The locations of the new entrance and exit will allow for safe access to and from the staging area. Utilization of the MPR-4 staging areas is anticipated to increase the total temporary impact area for the Project by approximately 4.7 acres of disturbed/developed habitat that contains no sensitive resources. The staging areas would be restored (as needed and in coordination with OCWR and Encroachment Permit requirements) to pre-Project conditions after construction activities are complete. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed staging areas are within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>						
Biological	<input checked="" type="checkbox"/>	No Resources Present	<input type="checkbox"/>	Resources Present	<input type="checkbox"/>	N/A, Change would not affect resources
Previous Biological Survey Report Reference: The MPR-4 staging areas were not included as part of any previous Project-related biological survey report. A Biological Review was performed for the MPR-4 staging areas which determined there are no special-status species and no suitable habitat for special-status species located within the staging areas. The Biological Review for MPR-4 is included as Attachment D .						
Cultural	<input checked="" type="checkbox"/>	No Resources Present	<input type="checkbox"/>	Resources Present	<input type="checkbox"/>	N/A, changes would not affect resources
Previous Cultural Survey Report Reference: The MPR-4 staging areas were included in the records search for cultural and paleontological resources within the Project's study area as part of SDG&E's application for a Certificate of Public Convenience and Necessity (CPCN) for the Project and Proponent's Environmental Assessment (PEA). There are no previously recorded archeological sites located within the MPR-4 area. Cultural and paleontological resource surveys will not be required since the staging areas are on previously disturbed landfill property, and there will be minimal ground disturbance during construction activities (post-driven fence, ramp construction, vegetation clearing). Minor grading may occur in order to install the entrance and exit ramps for the western staging along Avenida La Pata.						

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None (MPR-4 staging areas were not included in the Project's FEIR temporary impact area calculations).

New disturbance acreage: 4.7 acres of temporary impact area.

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, and Seismicity	<input type="checkbox"/> Y	Utilization of the MPR-4 staging areas would not increase the severity of any previously identified impacts to geology, soils, and seismicity, and would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging areas would not require agency consultation relating to geology, soils, or seismicity.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	The locations of the MPR-4 staging areas are slated for future landfill use, but have never previously been used for waste storage, so there is not a potential to expose or disturb hazardous materials. Utilization of the MPR-4 staging 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 FEIR, Section 4.8.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging areas would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology	<input type="checkbox"/> Y	Utilization of the MPR-4 staging 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 were assessed in the Project's FEIR, Section 4.9. The Project's Stormwater Pollution Prevention Plan (SWPPP) would be amended to fully cover MPR-4 and associated activities. In addition, applicable APMs and MMs relating to hydrology and water quality that would be applied to the Project, would apply to MPR-4, and would be implemented to mitigate for impacts related to hydrology and water quality.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging areas would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	



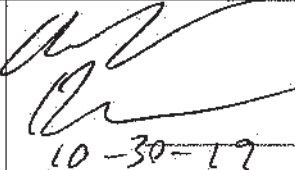
- MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well
- MM WQ-1: Pesticide Application

Cultural Resources	<input type="checkbox"/> Y	<p>The use of the MPR-4 staging 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 FEIR, Section 4.5. Review of the Project's previous records search (prepared for the PEA) confirmed the lack of previously recorded cultural resources within the MPR-4 staging areas. Cultural resource monitoring and Native American monitoring is not anticipated to be required since the proposed staging areas are on previously disturbed land and there are no Environmentally Sensitive Areas within 100 feet. Although no new or altered APMs or MMs would be required, the following APMs and MMs are applicable and would be implemented for MPR-4 work activities:</p> <ul style="list-style-type: none"> • APM CUL-1: Worker Training for Cultural Resources • MM CUL-1: Supplemental Worker Training for Cultural Resources <p>No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to paleontological resources are anticipated to occur as a result of the proposed staging areas. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5. Paleontological monitoring is not anticipated to be required since the proposed staging areas are located on previously disturbed land, and ground-disturbing activities will be minimal (post-driven fence, ramp construction, vegetation clearing).</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging areas would not require agency or tribal consultation in relation to cultural resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input checked="" type="checkbox"/> Y	<p>Construction activities within and surrounding the MPR-4 staging areas would not substantially affect traffic and circulation in a manner different from the impacts assessed as part of the Project's FEIR, Section 4.15.</p> <p>A new construction entrance and exit ramp will be installed facing Avenida La Pata to allow for a safer vehicle access and exit point to the western staging area. Water trucks may be used to mitigate fugitive dust during site preparation activities. Hauling of recycled water will be performed in compliance with state and local requirements as described in the Project's Water Efficiency Plan.</p> <p>The access roads between the staging areas are owned by OCWR and will be maintained by SDG&E in accordance with the lease agreement. The road that connects the eastern and western staging areas utilizes an existing underground tunnel that goes underneath Avenida La Pata. This access road will</p>

	<input type="checkbox"/> N	<p>provide the sole entry and exit point to the eastern staging area, as there is no direct access from Avenida La Pata. Construction vehicles will not make left turns either into or out of the western staging area.</p> <p>The MPR-4 staging areas may also be used as helicopter fly yards, where helicopters would load, unload, land, and refuel when in use. Although Staging Areas 2 and 5 were identified as designated fly yards in the FEIR, SDG&E does not currently have lease agreements for those locations, nor are those locations currently anticipated to be utilized by the Project. Therefore, the MPR-4 staging areas may be needed as fly yards. In accordance with APM TR-6, the staging areas (and therefore helicopter landing areas) are located away from residences and other sensitive noise receptors. The nearest sensitive noise receptor is a housing subdivision approximately 0.5 miles southeast of the eastern staging area. Any helicopter activities would also be in compliance with the requirement in APM TR-6 that states Project fly yards would be kept clear of all other construction activity during helicopter operations.</p> <p>In accordance with MM TR-2(a), the initial helicopter safety and external-load training is provided to personnel through the Safety and Environmental Awareness Training (SEAP). A Helicopter Safety Plan will be submitted to the CPUC prior to helicopter operations. In addition, a safety brief, plan of operations, and refresher external-load operations training shall occur at the start of all days during which helicopter external-load operations are planned to occur. No Project personnel (including helicopter pilots and crew members) shall work in proximity to or be involved with helicopter external-load operations unless they receive both the initial SEAP training and the daily safety brief and refresher training.</p> <p>No new or significant increase to previously identified significant impacts would occur as a result of the MPR-4 activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-4 work activities:</p> <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries • APM TR-5: Material Removal, City Streets • APM TR-6: Helicopter Use • APM TR-7: Traffic Control Plans • MM TR-2(a): Helicopter Safety Plan and External-Load Training Program • MM TR-3: Notification and Monitoring of Helicopter Use • MM TR-5: Content Requirements of the Traffic Control Plan
Agency Consultation?	<input checked="" type="checkbox"/> Y	An Encroachment Permit and Traffic Control Plan will be required from Orange County for this work. In addition, if the

	<input type="checkbox"/> N	MPR-4 staging areas are used as helicopter fly yards, SDG&E will notify the Long Beach Flight Standards District Office and conduct all activities in accordance with MM TR-3, APM TR-6, MM TR-2(a) and Project requirements.
Air Quality	<input type="checkbox"/> Y	The use of the MPR-4 staging 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 FEIR, Section 4.3.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging 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 MPR-4 staging 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 FEIR, Section 4.11. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-4 work activities: <ul style="list-style-type: none"> • APM NOISE-1: Nighttime and Weekend Activities • MM NV-1: Nighttime and Weekend Construction Noise Controls • MM NV-5: Noise Control Plan
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging 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 staging areas. Temporary fencing and screening material would be installed in compliance with MM AES-3, and work areas would be kept clean in accordance with APM AES-1. The MPR-4 staging areas would be restored to pre-Project conditions (in coordination with OCWR and Encroachment Permit requirements, and in compliance with APM AES-2 and MM AES-2) upon completion of Project activities east of I-5. Use of the MPR-4 staging areas would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's FEIR, Section 4.1. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-4 work activities: <ul style="list-style-type: none"> • APM AES-1: Clean Work Areas • APM AES-2: Restoring Disturbed Areas • MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions • MM AES-3: Screen or Effectively Locate Laydown Areas • MM AES-5: Shield or Downcast Construction Lighting
	<input checked="" type="checkbox"/> N	
	<input type="checkbox"/> Y	

Agency Consultation?	<input checked="" type="checkbox"/> N	The proposed staging areas would not require agency consultation relating to visual resources.
Vegetation and Wildlife	<input type="checkbox"/> Y	<p>The use of the MPR-4 staging areas would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed staging areas (totaling 4.7 acres) are entirely within disturbed/developed habitat (on landfill property) and do not include any sensitive biological resources or habitat for special-status species as described in the Biological Review for MPR-4 (Attachment D). Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-4 staging areas, any indirect impacts that may occur to sensitive species in the vicinity of the work areas will be mitigated in accordance with the MMs listed below. If the proposed staging areas are used as helicopter fly yards, vertical buffers will be established in accordance with MM BR-6.</p> <p>There will be some vegetation clearing (mowing) required to prepare the staging areas, but there will be no tree removals required as there are no existing trees onsite. In coordination with OCWR and in accordance with Encroachment Permit requirements, the staging areas will be returned to pre-construction conditions after the Project's transmission and distribution activities east of I-5 are complete. No new or altered APMs or MMs would be required. The following MMs would be implemented for MPR-4 work activities:</p> <ul style="list-style-type: none"> • MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic and Wetland Areas. • MM BR-2: Biological Monitoring • MM BR-3: Preconstruction Surveys. • MM BR-4: Limit Removal of Native Vegetation Communities and Trees. • MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. • MM BR-9: Invasive Plant Control Measures.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed staging areas would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	10-31-2019	Jennifer Kaminsky		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	10-31-2019	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	10/30/19	Andrew Barnsdale	 10-30-19	<input type="checkbox"/> Approved <input checked="" 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:

COA-1. The extent of the MPR-4 staging areas will be limited to the areas shown on the figure titled SOCRE PROJECT MPR-4 and will be used for project construction staging and related activities only during the period of project construction and restoration (anticipated to be approximately three years) or upon termination of the lease agreement with Orange County Waste and Recycling (OCWR), whichever comes first.

COA-2. Prior to the start of construction of the MPR-4 staging areas, SDG&E will provide evidence of obtainment of a lease agreement with OCWR to the CPUC for its records.

COA-3. Prior to the start of construction of the staging areas or entrance and exit ramps along Avenida La Pata, including mobilization of any construction vehicles, equipment, or materials onto these areas, SDG&E will provide copies of the final Encroachment Permit and Traffic Control Plan obtained from Orange County to the CPUC for its records.

COA-4. Immediately following completion of construction activities requiring use of the MPR-4 staging areas, SDG&E will initiate restoration of the staging areas to pre-Project conditions based on pre-Project photo documentation by SDG&E, Encroachment Permit requirements, applicable lease agreement requirements, and in coordination with OCWR.

COA-5. Ingress and egress for the staging areas will only be between the western MPR-4 staging area and Avenida La Pata and there will be no direct access between the eastern MPR-4 staging area and Avenida La Pata. The access road connecting the eastern and western staging areas via underpass tunnels beneath Avenida La Pata will serve as the sole connector between the staging areas and will be maintained by SDG&E in accordance with its lease agreement with Orange County Waste and Recycling (OCWR).

COA-6. Left turns by construction vehicles and all other project-related vehicles will be prohibited either into or out of the western MPR-4 staging area from or onto Avenida La Pata.

COA-7. Use of the MPR-4 staging areas will adhere to all applicable conditions of approval identified for approved project NTPs and all applicable Mitigation Measures and Applicant Proposed Measures identified for the project in the Mitigation, Monitoring, Compliance, and Reporting Program Compliance Plan.

COA-8. The staging areas will not be used as helicopter fly yards or landing areas pending further review by the CPUC PM.

Prepared by: Joe Donaldson, E&E, CPUC Compliance Manager Date: October 25, 2019










ATTACHMENT B
MPR-4 Figure

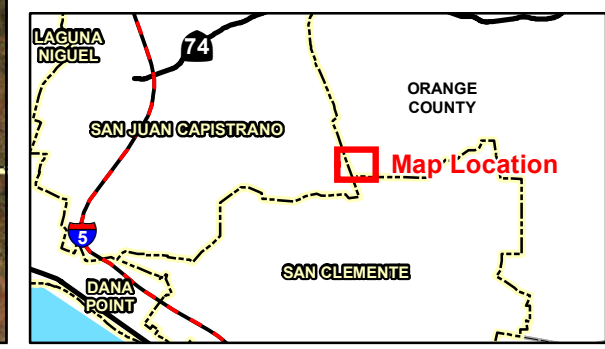
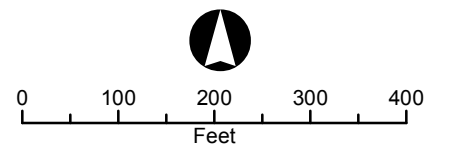
SOCRE PROJECT

MPR-4

Orange County, CA

LEGEND

-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
- MPR-4 Components**
-  New Construction Entrance / Exit
-  Potential Staging Area
- Other Project Components**
-  New Transmission Standard Pole (for Reference Only)
-  230 kV Overhead Transmission Line
-  Existing Access Road



ATTACHMENT C
MPR-4 Site Photographs



View of western staging area from Avenida La Pata, facing S.



View of western staging area, facing S.



View of western staging area, facing SE.



View of access road tunnel connecting the west and east staging areas, facing SE.



View of access road tunnel connecting the west and east staging areas, facing E.



View of access road tunnel with truck for scale, facing E.



View of access road and part of eastern staging area, facing SW.



View of eastern staging area,
facing W.

ATTACHMENT D
MPR-4 Biological Review

SAN DIEGO GAS & ELECTRIC COMPANY

**SOUTH ORANGE COUNTY RELIABILITY
ENHANCEMENT PROJECT**

**BIOLOGICAL REVIEW FOR
MINOR PROJECT REFINEMENT No. 4**



PREPARED BY:



September 2019

ICF. 2019. Biological Review for Minor Project Refinement No. 4. September.
(ICF 00289.17.) San Diego, CA. Prepared for San Diego Gas & Electric, San
Diego, CA.

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Acronyms and Abbreviations

APM	Applicant Proposed Measure
BMP	Best Management Practices
CAGN	California gnatcatcher
CPUC	California Public Utilities Commission
FEIR	Final Environmental Impact Report
kV	Kilovolt
MPR	Minor Project Refinement
MM	Mitigation Measure
SDG&E	San Diego Gas & Electric Company
SOCRE	South Orange County Reliability Enhancement

1. Introduction

This biological review was prepared to document the biological conditions of the Minor Project Refinement No.4 (MPR-4) identified for the San Diego Gas & Electric Company's (SDG&E) South Orange County Reliability Enhancement Project (SOCRE or Project).

SDG&E is requesting approval of MPR-4 for two new staging areas (MPR-4 work area) to facilitate transmission and distribution line construction east of Interstate 5 (I-5). The MPR-4 work area is dissected by Avenida La Pata in unincorporated Orange County, just north of the City of San Clemente and just east of the City of San Juan Capistrano (Figure 1). Combined, the MPR-4 staging areas are approximately 4.7 acres.

The MPR-4 work area would be utilized during Project activities associated with distribution and transmission line construction east of I-5. Construction vehicles and equipment would be stored entirely within the MPR-4 staging areas. Minimal ground disturbance will be required to perform MPR-4 activities (post-driven fence, ramp construction, vegetation clearing). Minor grading may also occur in order to install an entrance and exit ramp.

2. Methods

A biological field survey was conducted on September 13, 2019 to determine if the area within 500 feet of the MPR-4 work area (survey area) provides habitat for special-status species. While onsite, the biologist conducted vegetation mapping of the survey area and scanned for special-status species and nesting birds within the survey area. Binoculars were used to assess vegetation and habitat potential within restricted areas and privately-owned properties within the survey area. These results, along with aerial imagery and vegetation data were used to assess potential impacts from construction staging activities associated with this MPR-4 request.

3. Results

3.1 Vegetation within the MPR-4 Work Area

The following vegetation communities or land cover types were noted within the MPR-4 work area during the biological review conducted on September 13, 2019 (Table 1).

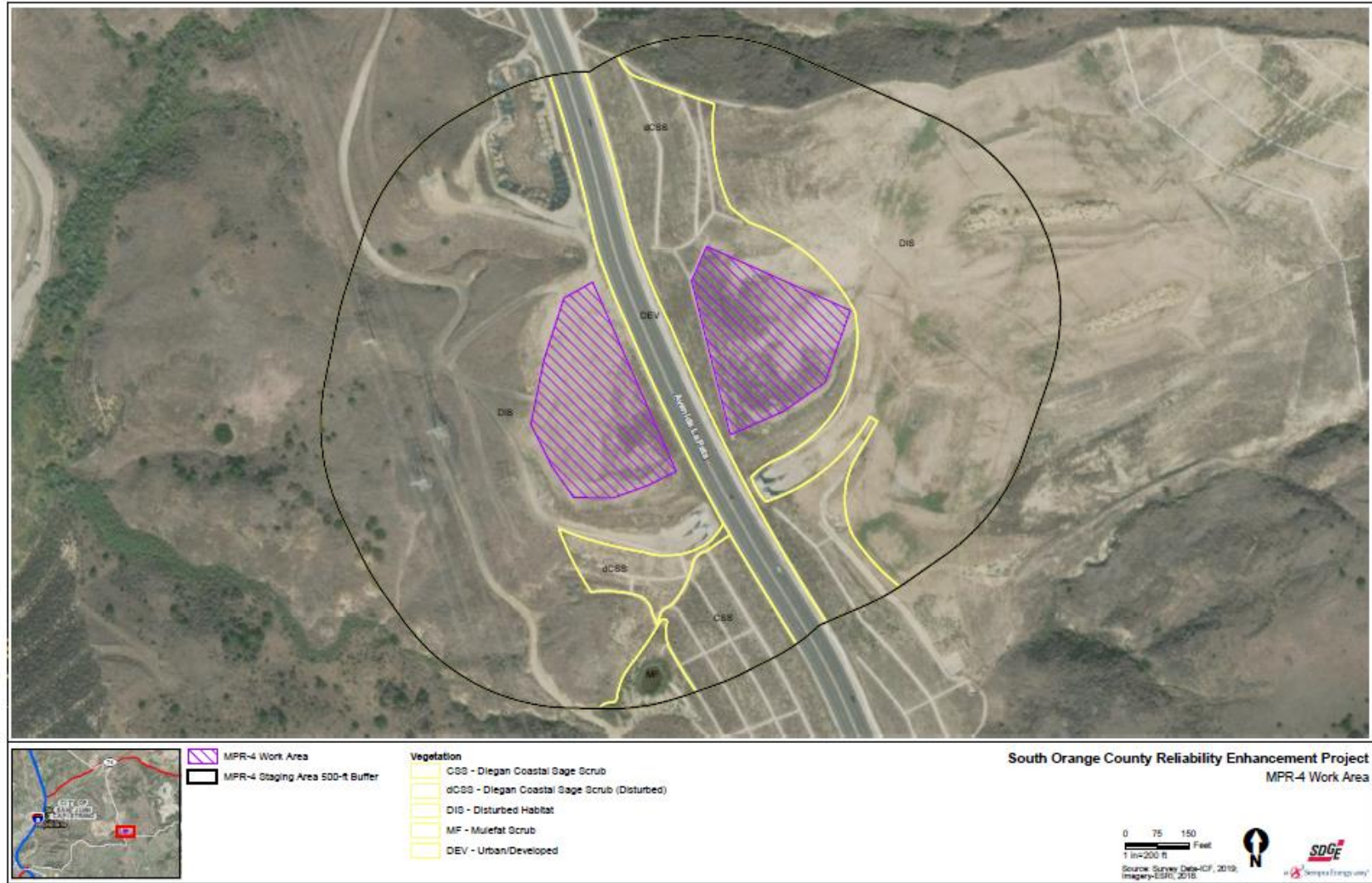
Table 1: Vegetation and Land Cover within the MPR-4 Work Area

Vegetation/Land Cover	Total Area (acre)
Disturbed Habitat	4.70
TOTAL	4.70

3.1.1 Disturbed Habitat

Disturbed habitat is composed primarily of non-native and/or invasive grasses and forbaceous species, but depending on types and frequencies of disturbances, soil types, microclimate variables, available seed sources and other factors, disturbed habitat may also contain shrubs. The disturbed habitat is present throughout the entire MPR-4 work area. The dominant plant species within the MPR-4 work area include Russian thistle (*Salsola tragus*), flax-leaved horseweed (*Erigeron bonarensis*), and white sweetclover (*Melilotus albus*). Disturbed habitat extends both east and west of the MPR-4 work area up to the 500 foot buffer.

Figure 1. Vegetation Communities within 500 feet of MPR-4 Work Areas



3.2 Other Vegetation in Survey Area

3.2.1 Developed

Developed is a land cover type associated with human-constructed land cover types devoid of vegetation. Developed areas within the survey area include Avenida La Pata, and the paved roadway traversing between the western and eastern MPR-4 staging areas.

3.2.2 Coastal Sage Scrub

Coastal sage scrub is found outside of the MPR-4 work area, approximately 175 feet south, directly west of Avenida La Pata and south of an existing access road. No direct impacts to the coastal sage scrub in this area will occur as a result of MPR-4 work activities. This stand of vegetation was revegetated as part of the construction of Avenida La Pata in 2015, and is relatively free of invasive species. Vehicular traffic will use existing access roads to move between the MPR-4 work area and other Project construction areas, in accordance with MM BR-1.

3.2.3 Disturbed Coastal Sage Scrub

Disturbed coastal sage scrub is disturbed habitat composed primarily of non-native and/or invasive grasses and forbaceous species, but also containing minor occurrences of coastal sage scrub species. Disturbed coastal sage scrub is found approximately 75 feet south of the western MPR-4 staging area, and directly north and south of the eastern MPR-4 staging area. These areas also are part of the revegetation of Avenida La Pata, but these stands are exhibiting more invasive species cover and less vigorous growth than the coastal sage scrub stand to the south.

3.2.4 Mulefat Scrub

Mulefat Scrub is dominated by mulefat (*Baccharis salicifolia*), a native riparian-adapted species. A very small, isolated stand of revegetated mulefat scrub is found approximately 300 feet south of the MPR-4 work area in a constructed detention basin.

3.3 Special-Status Species

No special-status species were noted within the MPR-4 work area. Visual and auditory surveying was used to determine the absence of special-status species within the MPR-4 work area, consistent with California Natural Diversity Database (CNDDDB) reportings. The CNDDDB showed the California monarch (*Danaus plexippus*) overwintering population to be presumed extant over a large, generalized CNDDDB polygon encompassing the entirety of the MPR-4 work area, but the September 13 survey of the area was negative for these species within the MPR-4 work area and there is no suitable habitat for this species onsite.

Least Bell's vireo (*Vireo bellii pusillus*) also was documented in the CNDDDB approximately 200-500 feet west of the western MPR-4 work area and western spadefoot (*Spea hammondi*) was documented in the CNDDDB approximately 1,000 feet east of the eastern MPR-4 staging area. No suitable habitat exists within the MPR-4 work area for the least Bells' vireo or Western spadefoot species and proposed activities will have no direct impact.

Burrowing owl (BUOW) (*Athene cunicularia*) was documented in the CNDDDB approximately 650 feet north of the western MPR-4 work area and 1,000 feet east of the eastern MPR-4 work area. The MPR-4 staging areas had been previously graded and show signs of compaction, gravel had been previously laid on the site, and mechanical disturbance is noticeable throughout the staging areas. Additionally, no ground squirrel or BUOW burrows were observed during the biological survey. Due to these factors and the signs of repeated disturbance, no suitable habitat exists within the MPR-4 staging areas for BUOW and proposed activities will have no direct impact.

One coastal California gnatcatcher (CAGN) (*Poliophtila californica*) was heard calling to the east of the MPR-4 work area. No suitable CAGN habitat exists within the MPR-4 work area and the proposed activities will have no direct impact on CAGN.

Indirect impacts on CAGN and other special-status species will be minimized or avoided by implementation of SDG&E's Operational Protocols under the SDG&E Subregional Habitat Conservation Plan / Natural Community Conservation Plan (HCP/NCCP) as well as mitigation measures from the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) within the Final Environmental Impact Report (FEIR; CPUC 2016), summarized in Section 4, below.

4. Applicable Mitigation Measures and Best Management Practices

The following represent all applicable Mitigation Measures (MM) from the FEIR as well as best management practices (BMPs) that would apply to construction activities proposed in this MPR-4 request.

MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic, and Wetland Areas. In all project locations, vehicular traffic (including movement of all equipment) will be restricted to established construction areas indicated by flagging and signage. California Public Utilities Commission (CPUC) notification and approval will be required for any additional disturbance areas already identified and evaluated for the project pursuant to CEQA. As feasible, the applicant shall use disturbed or low habitat value areas before using undisturbed or higher quality habitat areas, as determined by a qualified biologist. Prior to ground disturbing activities, sensitive resources, such as waterbodies, oak trees, special status plant populations, and natural communities, will be clearly marked and avoided.

All aquatic features, including vegetated washes, creeks, drainages (ephemeral and perennial), and riparian areas, will be spanned by the 230-kV transmission and 12-kV distribution line where possible. If construction will occur within 200 feet of an aquatic feature, biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features. If the applicant cannot maintain the 50-foot exclusionary buffer, the applicant will submit best management practices (BMPs) to the CPUC for review and approval prior to construction. In addition, if the applicant is unable to maintain the 50-foot buffer, the applicant shall consult with USACE and CDFW regarding potential impacts to streams or wetlands.

MM BR-3: Preconstruction Surveys

- a. Preconstruction surveys will be conducted by CPUC-approved, qualified biologists according to standardized methods. Surveys will encompass all construction areas. Existing baseline vegetation data will be used during post-construction restoration efforts, as outlined in Section 7 of the SDG&E Subregional NCCP/HCP. Preconstruction surveys will take place for each discrete work area within 14 days of the start of ground disturbance, or if work has lapsed for longer than 14 days.
- b. Additionally, a CPUC-approved, qualified biologist will conduct preconstruction clearance sweeps for special status species at all access, staging, and work areas where suitable habitat is present within approximately 24 hours of construction and restoration activities each day.
- c. In addition to these preconstruction surveys, a CPUC-approved biologist will conduct protocol-level surveys for coastal California gnatcatcher and least Bell's Vireo along the proposed 12-kV distribution line where surveys have not yet taken place. A CPUC-approved biologist will also perform protocol-level southwestern willow flycatcher and rare plant surveys throughout the entire project area, where suitable habitat exists.

If a special status species is found at any time, the CPUC will be notified within 48 hours, and the CPUC will determine the need for additional consultation with the appropriate resource agency or agencies.

MM BR-4: Limit Removal of Native Vegetation Communities and Trees. The removal of native vegetation and trees will be limited to the minimum practicable area required for construction of the project. To the extent feasible, grading, grubbing, graveling, or paving will only occur for permanent project components. Temporary staging areas will be used in such a way that it facilitates post-construction restoration, per Section 7 of the SDG&E Subregional NCCP/HCP. Drive-and-crush methods will be employed, with the exception of those areas where this method is not feasible for temporary staging areas for safety reasons and placement of temporary structures, such as construction trailers and drop tanks.

MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. The applicant will develop a Nesting Bird Management Plan in consultation with the USFWS, CDFW, and CPUC that outlines protective measures and BMPs that will be employed to prevent disturbance to active nests of both special status and Migratory Bird Treaty Act (MBTA) protected bird species with the potential to occur in the project area. The Nesting Bird Management Plan will include the following components:

- Appropriate survey timing, extents, and methods, including dates of local breeding season when surveys must take place; monitoring and reporting protocol; protocol for determining whether a nest is active; and protocol for documenting, reporting, and protecting active nests within construction and restoration areas will be included in the Nesting Bird Management Plan. If preconstruction survey protocols exist for a special status avian species with a potential to be impacted by the project, the plan will outline the implementation of these protocols. The survey area will include the construction area, plus an additional distance large enough to accommodate the protective buffer of MBTA-protected bird species likely to occur in proximity to the construction area. The plan will also specify approved nest deterrent methods, inactive nest management, and state that project-related nest failures will be reported to the USFWS and CDFW.
- Appropriate and effective buffer distances, including horizontal buffers from nests, horizontal buffers from territories, if appropriate, and vertical buffers for helicopters will be included. Buffers

will not be based on generalized assumptions regarding all nesting birds, but will be specific to the site and species/guild and account for specific stage of nesting cycle and construction work type. During construction and restoration, a CPUC-approved avian biologist will implement the appropriate buffer distance in accordance with the plan, and a process for a reduction from the plan's nesting buffer distances will be specified. Buffer reductions for special status species and raptors shall be determined upon consultation with USFWS, CDFW, and the CPUC. Buffer reductions for common species must be approved by the CPUC-approved avian biologist and USFWS, CDFW, and CPUC will be notified.

- Vertical buffers would be based on anticipated effects of rotor wash and noise for each class of helicopter (i.e. Light Duty, Medium Duty, and Heavy Duty). Surveys and monitoring of the active buffer areas will be completed by a CPUC-approved biologist before, during, and after helicopter use in the vicinity of active buffers and reported to the CPUC.
- The Nesting Bird Management Plan will include the minimum requirements to become a CPUC-approved avian biologist and biological monitor for nesting birds, including education, experience in conducting biological surveys, and experience with specific birds in the project area.
- The CPUC-approved biological monitor will halt work if it is determined that active nesting will be disturbed by construction or restoration activities until further direction or approval to work is obtained from the CPUC and/or appropriate wildlife agencies.

The Nesting Bird Management Plan will be submitted to the USFWS, CDFW, and CPUC for review and comment no more than six months prior to the start of construction, with the intent that the plan will be finalized no more than two months prior to the start of construction. The final plan will be implemented during construction and restoration activities. A Nesting Tracker will be maintained and updated weekly during the nesting bird season, and will be submitted to USFWS, CDFW, and CPUC on a monthly basis. This Nesting Tracker will contain data such as species, location, buffer, monitor name, and status of the nest.

MM BR-9: Invasive Plant Control Measures. The applicant will use standard BMPs to avoid the introduction and spread of controllable invasive plant species such as tamarisk (*Tamarix* sp.) and giant reed (*Arundo donax*) during construction of the project. Proper handling during construction will include the following:

- All vehicles and equipment will be cleaned prior to arrival at the work site.
- Crews, with construction inspector oversight, will ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads.

Best Management Practices. The following best management practices (BMPs) will be implemented.

- Pursuant to the NCCP Operational Protocols, hydrologic impacts will be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding and avoid offsite erosion siltation.
- A perimeter sediment and runoff control BMP will be installed along the western MPR-4 work area bordering the riparian habitat to prevent runoff into the wash.

- During work activities, all trucks, tools, and equipment will be kept on existing access roads or cleared areas.
- Waste management and materials controls will be implemented, including covering and properly disposing of trash and using secondary containment for any staged equipment.
- Daily spot checks will be conducted by a biological monitor or the Lead Environmental Inspector to document compliance with these BMPs.

5. References

California Public Utilities Commission. 2016. *South Orange County Reliability Enhancement Project Final Environmental Impact Report*. April

Appendix A. Photo Log of Onsite Conditions



Photo 1: MPR-4 Eastern staging area location facing southeast



Photo 2: MPR-4 Eastern staging area location facing north



Photo 3: MPR-4 Western staging area location facing southwest



Photo 4: MPR-4 Western staging area location facing north