

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

March 30, 2020

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

Re: Minor Project Refinement No. 5 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. 5 (MPR-5) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-5 will authorize the use of an extended temporary work area around the existing work area for new transmission standard pole #10 (Location 10) and existing pole Z630977, previously approved in Notice to Proceed No. 6 (NTP-6). The requested additional work area will total 22,026 square feet, or .5 acres. The requested temporary work area is located entirely within the SDG&E right-of-way (ROW) at Tar Farms Stables in San Juan Capistrano, and will be used to facilitate the construction of Location 10. Please refer to **Attachment B, MPR-5 Figure** and **Attachment C, MPR-5 Site Photographs** to view the MPR-5 work area.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-5 Figure

Attachment C: MPR-5 Site Photographs

Description of MPR-5 Workspace and Activities

As mentioned above, MPR-5 would authorize SDG&E to use a new temporary work area (totaling 22,026 square-feet) that will surround the approved work area for Location 10 and existing pole Z630977. The additional work area is necessary to safely and efficiently complete the installation of Location 10. Due to the presence of groundwater encountered beneath the surface during preliminary borings, the method of installation will require more equipment to be on site at one time. The activities expected to be performed during the Location 10 pole installation are summarized as follows: Drilling equipment will be mobilized to the site, and drilling will take place concurrently with soil haul-off operations. Drilling fluid will be hauled to the site via water trucks and added to the hole until excavation is at full depth. Baker tanks will be delivered and stored on site. A 65- to 70-foot corrugated metal pipe (CMP) casing will be inserted into the hole

using a crane and grouted with concrete in order to prevent collapse. After the CMP is grouted in place, drilling fluid will be pumped out of the hole and into baker tanks until the hole is dry. A rebar cage will then be set in the hole using a crane and concrete will be poured inside to create the foundation. This method is consistent with anticipated variations in final engineering described in Section 2.4.5 of the FEIR and Section 2.0 of NTP-6.

The MPR-5 work area will be used for temporary laydown of materials and equipment and will provide additional space to be used for drilling, hauling, concrete and crane operations associated with Location 10 construction. The additional work area will also allow adequate space for equipment to safely park and maneuver during Location 10 installation activities (See **Attachment B, MPR-5 Figure**). No ground-disturbing activities will take place within the MPR-5 work area. There will be no trees or vegetation removed within the MPR-5 work area. And, no horse stables or other structures will be removed within the MPR-5 work area. The MPR-5 work area will be utilized for approximately 3 months and activities will begin immediately following MPR-5 approval. Following the use of the MPR-5 temporary work area, the area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with Tar Farms Stables.

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's NTP-6 approval letter dated October 30, 2019, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction requirements described in NTP-6. No permits are required for activities that will be performed within the MPR-5 work area. Tar Farms Stables has been notified by SDG&E that this additional work area would be utilized following MPR-5 approval, and they do not have any concerns or objections. Since MPR-5 activities will only occur within the SDG&E ROW, no lease agreement is required with Tar Farms Stables. No horse stables will be altered or removed as part of this MPR, and access to the stables will be maintained throughout construction.

MPR-5 Request for Approval

SDG&E respectfully requests approval of MPR-5 to utilize the new temporary work area for installation of Location 10, by April 6, 2020. The new temporary work area will be used in accordance with conditions outlined in the CPUC's NTP-6 approval letter. 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 Kenda Pollio, KP Environmental

ATTACHMENT A MPR-5 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: N	farch 30, 2020		Report No.: 5		
Date Approved: 4/	8/2020		Approval Ago (CPUC).	ency: California Public	c Utilities Commission
5 (MPR-5) tempora	: The Minor Project R ry work area is within ar Farms Stables prop	SDG&E right-	Location/Milepost: The MPR-5 temporary work area is located at Tar Farms Stables near new transmission standard pole #10 (Location 10) and existing pole Z630977, in the City of San Juan Capistrano.		
	i ve Cover: The 22,02 ea (0.5-acre) is e I habitat.		Sensitive Resources: There are no sensitive resources in the MPR-5 temporary work area. See resource discussions below.		
Modification From:	☐ Permit ☐ Mitigation Measure	☐ Plan/Pro	cedure	Specification	☐ Drawing
work area required Reliability Enhauthe existing work to Proceed No.	ired to facilitate of nement Project (So area for Location	construction SOCRE or Pr 10 and existi ar Farms St	of Location oject). The ne ng pole Z630 ables. The	val of MPR-5 for a 10 for the South ew temporary work 1977, previously app new MPR-5 work	Orange County area surrounds proved in Notice area will total

The additional MPR-5 work area is necessary to safely and efficiently complete the installation of Location 10. Due to the presence of groundwater encountered beneath the surface during preliminary borings, the method of installation will require more equipment to be on site at one

time. The activities expected to be performed during the Location 10 pole installation are summarized as follows: Drilling equipment will be mobilized to the site, and drilling will take place concurrently with soil haul-off operations. Drilling fluid will be hauled to the site via water trucks and added to the hole until excavation is at full depth. Baker tanks will be delivered and stored on site. A 65- to 70-foot corrugated metal pipe (CMP) casing will be inserted into the hole using a crane and grouted with concrete in order to prevent collapse. After the CMP is grouted in place, drilling fluid will be pumped out of the hole and into baker tanks until the hole is dry. A rebar cage will then be set in the hole using a crane and concrete will be poured inside to create the foundation. This method is consistent with anticipated variations in final engineering described in Section 2.4.5 of the FEIR and Section 2.0 of NTP-6.

The MPR-5 work area will be used for temporary materials and equipment laydown and will provide additional space to be used for drilling, hauling, concrete and crane operations associated with Location 10 construction. The additional work area will also allow adequate space for equipment to safely park and maneuver during Location 10 installation activities. No ground-disturbing activities will take place within the MPR-5 work area. There will be no trees or vegetation removed within the MPR-5 work area. And, no horse stables or other structures will be removed within the MPR-5 work area. The MPR-5 work area will be utilized for approximately 3 months and activities will begin immediately following MPR-5 approval. Following the use of the MPR-5 temporary work area, the area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with Tar Farms Stables. Attachment B, MPR-5 Figure shows the location of the MPR-5 temporary work area.

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

Original Condition: The Project's Final Environmental Impact Report (FEIR) did not identify the need for additional temporary work area to complete the pole installation work at Location 10. However, since the MPR-5 work area is located immediately adjacent to the NTP-6-approved work area at Tar Farms Stables, it is within the geographic study area of the FEIR, and therefore, has been previously analyzed.

Justification for Change: Following final design and constructability review in the field, the construction contractor identified the need to gain access to the MPR-5 work area in order to facilitate the construction of Location 10, as there is not enough room within the previously approved work area to safely and successfully perform the Location 10 pole installation. The additional MPR-5 work area will be used for temporary laydown of materials and equipment and will provide additional space to be used for drilling and crane operations associated with Location 10 construction. The additional temporary work area will also allow adequate space for equipment to safely maneuver and turn around during Location 10 installation activities (See Attachment B, MPR-5 Figure). There will be no trees or vegetation removed within the MPR-5 work area, and no additional access to the MPR-5 work area will need to be constructed. No horse stables or other structures will be removed within the MPR-5 work area.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-5 Figure**, for a map of the proposed MPR-5 temporary work area location, which includes the direction of the point of view for each picture included in **Attachment C**. Refer to **Attachment C**, **MPR-5 Site Photographs**, for pictures of the current conditions within the MPR-5 temporary work area.

Environmental Impact: Utilization of the MPR-5 temporary work area to facilitate construction of Location 10 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 permits or new regulatory approval. Access will be maintained to the horse stables throughout construction activities except in case of emergency. Utilization of the MPR-5 temporary work area is anticipated to increase the total temporary impact area for the Project by approximately 0.5 acre of disturbed/developed habitat that contains no sensitive resources. Following the use of the MPR-5 temporary work area, the area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with Tar Farms Stables. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the new proposed temporary work area for MPR-5 are located immediately adjacent to the previously approved work area, and the new temporary work area is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:			
Biological	No Resources Present	Resources Present	N/A, Change would not affect resources

Previous Biological Survey Report Reference:

Biological resources along the Project alignment were studied, reviewed, and documented as part of SDG&E's application for a Certificate of Public Necessity (CPCN) for the SOCRE Project and Proponent's Environmental Assessment (PEA). Biological Resources were also discussed within the CPUC-conducted CEQA review process. As per Section 4.4 of the FEIR, no sensitive biological resources are present within the MPR-5 work area. A pre-construction survey was conducted for Location 10 on February 02, 2020 which encompassed the MPR-5 work area. No suitable habitat for special-status species was identified during the survey. The Project biologist verified that the current condition of the MPR-5 work area was consistent with the results provided in previous biological studies. Although there is no habitat for special-status species within the MPR-5 work area, the work area will be less than 50 feet from a CDFW/USACE jurisdictional drainage (San Juan Creek). Best Management Practices (BMPs) for the guard structure northwest of Location 10 were approved by the CPUC on January 15, 2020 in accordance with MM BR-1. The same BMPs would be implemented for the boundary of the MPR-5 work area as follows:

- Structural BMPs will be strategically placed to protect all jurisdictional aquatic features.
- Down gradient municipal drain inlets within 100 feet of each work area will be protected during construction activities.
- Public streets, sidewalks and curb gutters in the work area will be swept daily.
- A pm10 compliant street sweeper will be deployed as necessary to keep streets clean and free of construction debris.
- Environmental Inspector or Biological Monitor shall monitor all construction activities which occur within 50 feet of any jurisdictional aquatic feature.
- The Project's Qualified Stormwater Pollution Prevention Inspector (QSP) shall ensure that construction activities are performed in compliance with the Project's Stormwater Pollution Prevent Plan (SWPPP) and the Construction General Permit (CGP).
- If nighttime lighting is necessary adjacent to aquatic areas, lighting shall be shielded away from these areas to prevent impacts on aquatic wildlife.

Prior to the use of the MPR-5 work area, a notification will be sent to CDFW, USACE, and CPUC to document the change in work area within 50 feet of the drainage. Please refer to the Biological Resources Assessment that was included in the PEA for additional details regarding the MPR-5 work area.							
Cultural No Resources							
Resources Present							
Present							
☐ N/A, changes would not affect							
resources							
Previous Cultural Survey Report Reference: Cultural and paleontological resources within the Project's study area (including the MPR-5 work area) were studied, reviewed, and documented as part of SDG&E's application for a CPCN for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's FEIR, Section 4.5). There are no sensitive cultural resources within the MPR-5 work area.							
<u>Disturbance Acreage Changes:</u> ⊠ Yes □ No							
Original disturbance acreage: In the FEIR, the total temporary impacts for Location 10 were .15 acre, and permanent impacts .09 acre, totaling .24 acre. In NTP-6, this was changed to .24 acre of temporary impacts and no permanent impacts beyond the new pole foundation. New disturbance acreage: 0.5 acre 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	☐ Y 図 N	MPR-5 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work area would not 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.
Agency Consultation?	☐ Y	The proposed temporary work area would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	☐ Y 図 N	MPR-5 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work area would not require any new potentially hazardous materials to be used, would not create any new hazardous waste, would not expose any sensitive receptors not previously identified, and would not create any new hazard not previously disclosed in the Project's FEIR, Section 4.8.
Agency Consultation?	Y	The proposed temporary work area would not require agency consultation relating to hazards or hazardous materials.

Hydrology	⊠ Y	Utilization of the new temporary work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to hydrology and water quality that would be different from the impacts assessed in the Project's FEIR, Section 4.9. Dewatering, if required, would be consistent with dewatering activities described in the FEIR. The Applicable APMs and MMs relating to hydrology and water quality that would be applied to NTP-6, would apply to the MPR-5 area, and would be implemented to mitigate for impacts related to hydrology and water quality. • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well • MM WQ-1: Pesticide Application
Agency	□ Y	The new temporary work area would not require agency
Consultation?	⊠N	consultation relating to hydrology or water quality.
Cultural Resources	□ Y	No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to cultural resources are anticipated to occur as a result of the MPR-5 temporary work area. Review of the Project's previous cultural resources survey reports (prepared for the PEA) confirmed the lack of previously recorded cultural resources in the MPR-5 work area. No vegetation removal or ground-disturbing activities are
	⊠ N	proposed within the MPR-5 work area, therefore cultural monitoring is not anticipated to be required. Impacts would be similar to those disclosed within the Project's FEIR, Section 4.5. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-5 work activities:
		 APM CUL-1: Worker Training for Cultural Resources MM CUL-1: Supplemental Worker Training for Cultural Resources
		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 new temporary work area. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5. There are no ground-disturbing activities proposed within the MPR-5 work area, therefore paleontological monitoring is not anticipated to be required.
Agency Consultation?	☐ Y.	The MPR-5 work area would not require agency or tribal consultation in relation to cultural or paleontological resources.
	⊠ N	The continue of Maria and Maria and American Maria (Maria) (Maria) (Maria)

Traffic : Circula			Ý	Construction activities within the new temporary work area would not substantially affect traffic and circulation in a manner different from the impacts assessed as part of the Project's FEIR, Section 4.15. There would be no additional construction crews or change in equipment utilized for MPR-5, that would not already be accounted for in NTP-6. No new or significant increase to previously identified significant impacts would occur as a result of the MPR-5 activities. No new or altered APMs or MMs would be required, and the following
		\boxtimes	Ń	APM would be implemented for MPR-5 work activities: • APM TR-4: Off Peak Deliveries
Agen Consulta			Y	The new temporary work area would not require agency consultation relating to traffic and circulation.
			N.	
Air Qua	ality		Υ	The use of the MPR-5 temporary work area would not result in new significant impacts or a substantial increase in the severity
		\boxtimes	N	of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities proposed as part of this MPR-5 request:
Agen			Υ	The new temporary work area would not require agency
Consulta	ation?	\boxtimes	N	consultation relating to air quality.
Noise a Vibrat	I		Y	Utilization of the new temporary work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were
			N	already analyzed in the Project's FEIR, Section 4.11. Although the method of pole installation at Location 10 will require more equipment to be on site at one time, and therefore could increase noise, the activities are not anticipated to exceed the severe impact threshold described in the Construction Noise and Vibration Control Plan (CNVCP). All MPR-5 activities will be in compliance with the CNVCP.
Agen Consulta			Υ	The new temporary work area would not require agency consultation relating to noise and vibration.
		\boxtimes	N	
Aesthe Visu Resour	al		Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-5 work area. The MPR-5 work area would be restored to pre-Project conditions as required upon completion of Project activities. Use of the MPR-

	⊠ N	5 work area would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's 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-5 work activities: • APM AES-1: Clean Work Area
7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		 APM AES-2: Restoring Disturbed Area MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions MM AES-3: Screen or Effectively Locate Laydown Area MM AES-5: Shield or Downcast Construction Lighting
Agency Consultation?	□ Y ⊠ N	The new temporary work area would not require agency consultation relating to visual resources.
Vegetation and Wildlife		The use of the new temporary work area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed work area (totaling 22,026 square feet) occurs within disturbed/developed habitat and does not include any sensitive biological resources or habitat as described in the Project's FEIR Section 4.4. No trees or vegetation removal is proposed as part of MPR-5 activities.
		Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-5 work area, any indirect impacts that may occur to sensitive species in the vicinity of the work area will be mitigated in accordance with the MMs listed below:
		 MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area.
	⊠ N	 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.
Agency Consultation?	□ Y	The new temporary work area would not require agency consultation relating to vegetation and wildlife. However, a
Consultation?	⊠ N	notification will be submitted to CDFW, USACE, and CPUC prior to the use of the MPR-5 work area to document the change in work area within 50 feet of the San Juan Creek drainage, and to confirm that the previously approved BMPs will be installed for the new work area.

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	4/8/2020	Jennifer Kaminsky	J.f.I.K.J	Reviewed
San Diego Gas and Electric Environmental Project Manager	4/8/2020	Richard Quasarano	Bush	■ Reviewed
CPUC Project Manager	4/8/2020	Andrew Barnsdale	pr	Approved Approved with conditions (see below) Denied
For CPUC Compliance	Manager Us	e Only		
Refinement Appro	oved	Refinement Denied	Authority	

Conditions of Approval or Reason for Denial:

COA-1. The extent of the MPR-5 additional work area will be limited to the area shown on the figure titled "SOCRE PROJECT, MPR-5 Figure 1, Structure Location 10", and will be used only for temporary laydown of materials and equipment and to provide additional space for drilling and crane operations associated with Location 10 construction. MPR-5 activities will only occur within the SDG&E right-of-way.

COA-2. Use of the MPR-5 additional work area will adhere to all applicable conditions of approval identified for approved project NTPs, inclusive of NTP-6, and all applicable Mitigation Measures and Applicant Proposed Measures identified for the project in the Mitigation, Monitoring, Compliance, and Reporting Program Compliance Plan.

COA-3. The MPR-5 additional work area will be utilized for up to three (3) months following initiation of construction activities within the additional work area. If SDG&E determines it is necessary to utilize the area beyond the 3-month duration, SDG&E will request the extension in writing, including a justification and time limit for such use, and receive written approval of the extension by the CPUC prior to the end of the 3-month approved use period.

COA-4. Prior to the use of the MPR-5 additional work area, SDG&E will submit a notification to the CDFW, USACE, and CPUC documenting the change in work area within 50 feet of the San Juan Creek drainage and confirming that the BMPs, previously approved by the CPUC on January 15, 2020 in accordance with MM BR-1 and listed above in section "Previous Biological Survey Report Reference", will be implemented for the MPR-5 additional work area.

COA-5. Access to the MPR-5 additional work area will be by existing or previously approved access roads and no additional access to the MPR-5 additional work area will be constructed.

COA-6. Access to Tar Farms Stables will be maintained throughout construction activities unless superseded temporarily by the need for emergency access.

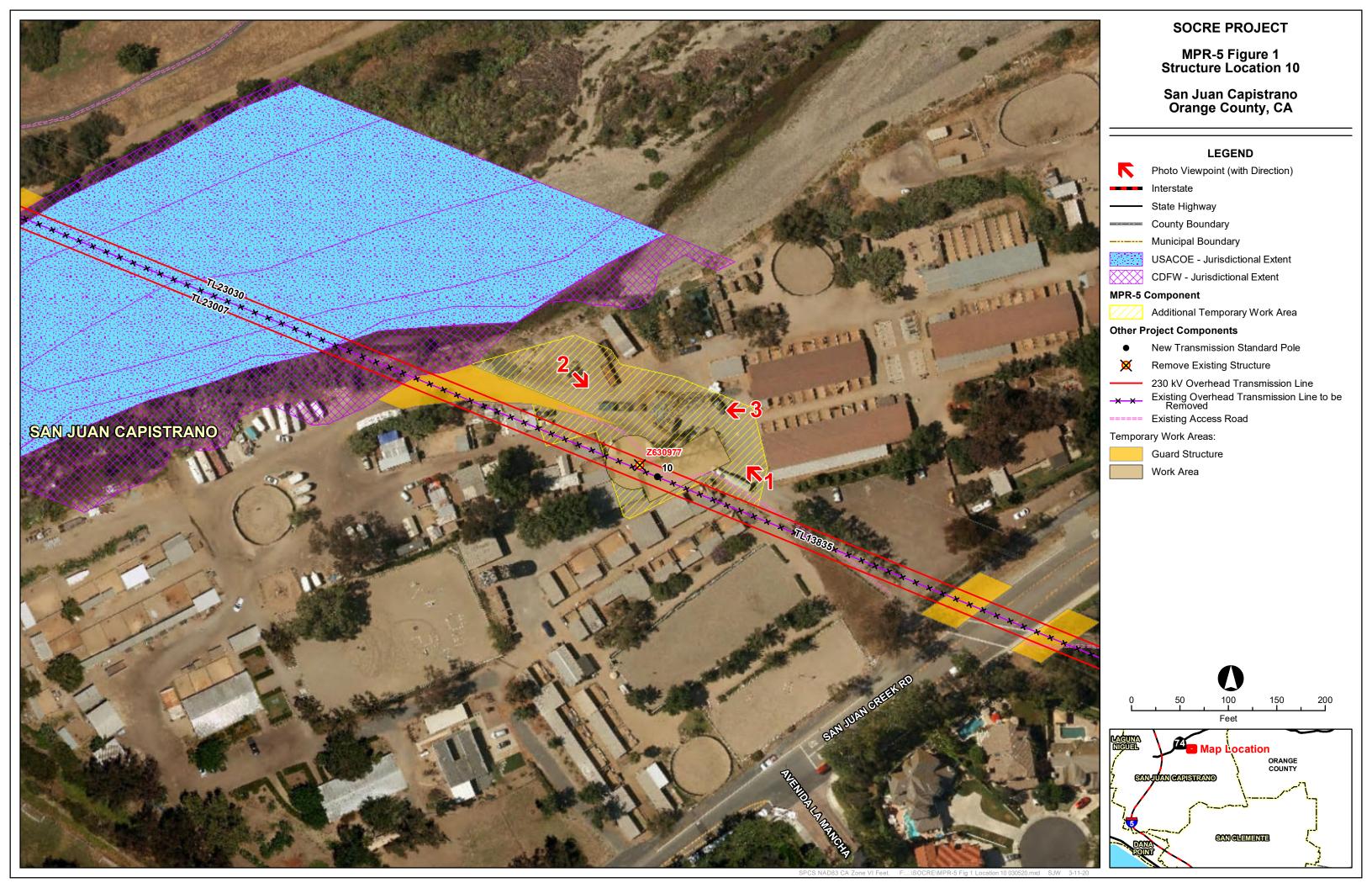
COA-7. No ground-disturbing activities will occur within the MPR-5 additional work area and no trees, other vegetation, or structures within the MPR-5 additional work area will be removed or altered. COA-8. Immediately following completion of use of the MPR-5 additional work area, SDG&E will initiate restoration of the area to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with Tar Farms Stables.

Date:

4/3/2020

Prepared by: Joe Donaldson, E&E, CPUC Compliance Manager

ATTACHMENT B MPR-5 Figure



ATTACHMENT C MPR-5 Site Photographs





