



Richard Quasarano
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August 26, 2020

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

Re: Minor Project Refinement No. 8 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. 8 (MPR-8) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-8 will authorize the placement of anchor blocks in two locations south of the existing work area for transmission cable poles #18 and #19, previously approved in Notice to Proceed No. 6 (NTP-6). The requested temporary disturbance areas will total 110 square feet, or .002 acres. The anchor blocks will be located entirely within the SDG&E right-of-way (ROW). Please refer to **Attachment B, MPR-8 Figure** and **Attachment C, MPR-8 Site Photographs** to view the approximate locations of the MPR-8 temporary disturbance areas.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-8 Figure
Attachment C: MPR-8 Site Photographs

Description of MPR-8 Workspace and Activities

As mentioned above, MPR-8 would authorize SDG&E to place two anchor blocks in two locations (four total) south of transmission cable poles #18 and #19. The two anchor blocks set side-by-side will occupy a disturbance area of approximately 11 feet by 5 feet in each location. The anchor blocks are needed to anchor down the guy wires and stabilize the scaffolding that will be used for cable termination work on poles #18 and #19. SDG&E reviewed other options to stabilize the scaffolding to avoid additional temporary disturbance, but this was the most feasible design. The exact locations of the anchor blocks may vary when being placed in the field, however the disturbance area will not change (See **Attachment B, MPR-8 Figure**).

No ground-disturbing activities are proposed as part of MPR-8. There will be no trees removed as part of MPR-8 activities. Some vegetation may need to be trimmed in the locations where the

anchor blocks will be placed. A crane will be used from within the approved work area to place the anchor blocks in order to limit disturbance. An SDG&E Field Construction Advisor will monitor the crane activities to ensure all safety precautions are taken to avoid the minimum approach distance (MAD) from energized lines. The MPR-8 temporary disturbance areas will be utilized for approximately 3 months and activities will begin immediately following MPR-8 approval.

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 MPR-8 activities.

MPR-8 Request for Approval

SDG&E respectfully requests approval of MPR-8 to place four anchor blocks south of the work area for poles #18 and #19, by August 28, 2020. The temporary disturbance areas 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-8 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: August 26, 2020

Report No.: 8

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 8 (MPR-8) temporary disturbance areas are within SDG&E right-of-way (ROW) on private property.

Location/Milepost: The MPR-8 temporary disturbance areas are located south of transmission cable poles #18 and #19, in the City of San Juan Capistrano.

Land Use/Vegetative Cover: The MPR-8 temporary disturbance areas total 110 square feet (0.02-acre) and are entirely within disturbed habitat.

Sensitive Resources: There are no sensitive resources in the MPR-8 temporary disturbance areas. 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 the placement of anchor blocks south of the existing work area for transmission cable poles #18 and #19, previously approved in Notice to Proceed No. 6 (NTP-6) for the South Orange County Reliability Enhancement Project (SOCRE or Project). The MPR-8 disturbance areas will total 110 square feet (0.002 acre).

The anchor blocks are needed to anchor down the guy wires and stabilize the scaffolding that will be used for cable termination work on poles #18 and #19. SDG&E reviewed other options to stabilize the scaffolding to avoid additional temporary disturbance, but this was the most feasible design. The exact locations of the anchor blocks may vary when being placed in the

field, however the disturbance area will not change. **Attachment B, MPR-8 Figure** shows the location of the MPR-8 temporary disturbance areas.

No ground-disturbing activities are proposed as part of MPR-8. There will be no trees removed as part of MPR-8 activities. Some vegetation may need to be trimmed in the locations where the anchor blocks will be placed. A crane will be used from within the approved work area to place the anchor blocks in order to limit disturbance. The MPR-8 temporary disturbance areas will be utilized for approximately 3 months and activities will begin immediately following MPR-8 approval.

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

Original Condition: The locations of the MPR-8 disturbance areas are located just south of the NTP-6-approved work area for transmission cable poles #18 and #19 and are within the SDG&E ROW, therefore they are within the geographic study area of the FEIR and have been previously analyzed.

Justification for Change: Following constructability review in the field, it was determined that anchor blocks would need to be placed outside of the approved work area in order to anchor down the scaffolding for cable termination work. Other options were carefully reviewed, but this was determined as the most feasible design.

Maps & Figures: Refer to **Attachment B, MPR-8 Figure**, for a map of the proposed MPR-8 temporary disturbance area locations. Refer to **Attachment C, MPR-8 Site Photographs**, for pictures of the current conditions of the approximate locations of where the anchor blocks will be set.

Environmental Impact: Utilization of the MPR-8 temporary disturbance areas to facilitate cable termination work at transmission cable poles #18 and #19 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. Utilization of the MPR-8 temporary disturbance areas is anticipated to increase the total temporary disturbance area for the Project by approximately 0.002 acre of disturbed habitat that contains no sensitive resources. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the MPR-8 temporary disturbance areas are located adjacent to a previously approved work area and are within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:			
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: 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. The habitat in the vicinity of			

the MPR-8 disturbance areas is a mix of disturbed and low-quality coastal sage scrub per surveys described in Section 4.4 of the FEIR. However, there will be no impact to coastal sage scrub habitat as the anchor blocks will be placed in disturbed habitat. A pre-construction survey was conducted on August 19, 2020 which confirmed there is no coastal sage scrub habitat within or directly around the MPR-8 temporary disturbance area locations. No suitable habitat for special-status species was identified during the survey.

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-8 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-8 temporary disturbance areas.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None, no disturbance was anticipated in this location.

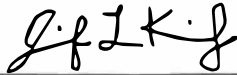
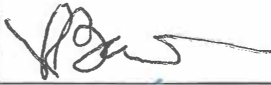

New disturbance acreage: 0.002 acre of temporary disturbance area.

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	MPR-8 does not involve the installation of any new facilities or performance of any new activities, nor are any ground disturbing activities proposed. 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.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary disturbance 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	MPR-8 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.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary disturbance areas would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	

Hydrology	<input type="checkbox"/> Y	<p>Utilization of the new temporary disturbance areas would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to hydrology and water quality that would be different from the impacts assessed in the Project's FEIR, Section 4.9. The Applicable APMs and MMs relating to hydrology and water quality that would be applied to NTP-6, would apply to the MPR-8 area, and would be implemented to mitigate for impacts related to hydrology and water quality.</p> <ul style="list-style-type: none"> MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary disturbance areas would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input type="checkbox"/> Y	<p>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 MPR-8 activities. 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-8 disturbance areas. Vegetation trimming may occur in the disturbance areas but ground-disturbing activities are not proposed as part of MPR-8 activities. Therefore, cultural monitoring is not 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-8 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 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-8 disturbance areas, therefore paleontological monitoring will not be required.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The MPR-8 temporary disturbance areas would not require agency or tribal consultation in relation to cultural or paleontological resources.
	<input checked="" type="checkbox"/> N	

Traffic and Circulation	<input type="checkbox"/> Y	<p>Use of the new temporary disturbance areas would not 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-8, that would not already be accounted for in NTP-6.</p> <p>No new or significant increase to previously identified significant impacts would occur as a result of the MPR-8 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-8 work activities:</p> <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary disturbance areas would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	The use of the MPR-8 temporary disturbance 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, as there are no new activities proposed as part of this MPR-8 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary disturbance 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 new temporary disturbance 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, as there are no new activities proposed as part of this MPR-8 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary disturbance 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-8 temporary disturbance areas. Use of the MPR-8 temporary disturbance areas would not result in a substantial increase in severity or a new significant

	<input checked="" type="checkbox"/> N	<p>impact from those analyzed and disclosed within the Project's FEIR, Section 4.1. APM AES-2: Restoring Disturbed Areas and MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions, is not applicable to MPR-8 as there will be no ground disturbance or vegetation removal, only possible trimming in disturbed habitat. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-8 work activities:</p> <ul style="list-style-type: none"> • APM AES-1: Clean Work Areas
Agency Consultation?	<input type="checkbox"/> Y	The new temporary disturbance areas would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>The use of the new temporary disturbance 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 disturbance areas (totaling 110 square feet) occur within disturbed habitat and do not include any sensitive biological resources or habitat. No tree or vegetation removal is proposed as part of MPR-8 activities. Vegetation trimming may be required but will be limited to the disturbance areas where the anchor blocks will be placed.</p> <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-8 disturbance areas, 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:</p> <ul style="list-style-type: none"> • MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area. • 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 type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary disturbance 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	8/28/20	Jennifer Kaminsky		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	8/28/20	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	8/28/20	Andrew Barnsdale		<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 activities for MPR-8 (i.e., placement of the anchor blocks) will be limited to the approximate locations shown on the figure titled "SOCRE PROJECT, MPR-8 Location 18 & 19". If the final locations of the anchor blocks change substantially (i.e., greater than 20 feet) from that shown on the figure, SDG&E will submit a map to the CPUC within two weeks of placement of the anchor blocks showing their final locations.

COA-2. MPR-8 activities will only occur within the SDG&E right-of-way.

COA-3. Work activities for MPR-8 will adhere to all applicable safety requirements for work occurring under and near existing overhead power lines.

COA-4. Work activities for MPR-8 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-5. The anchor blocks described for MPR-8 will be in place for approximately three months. If SDG&E determines it is necessary to maintain the anchor blocks beyond three months, 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 three-month period.

COA-6. If any ground disturbance occurs during placement or removal of the anchor blocks, SDG&E will initiate restoration/revegetation of the area to pre-Project conditions in compliance with APM AES-2, MM AES-2, and the Project's Storm Water Pollution Prevention Plan immediately following removal of the anchor blocks.



















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

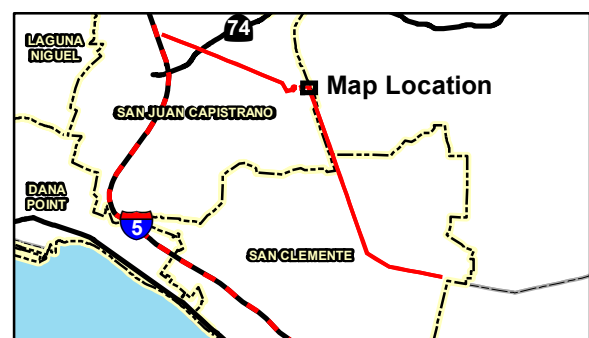
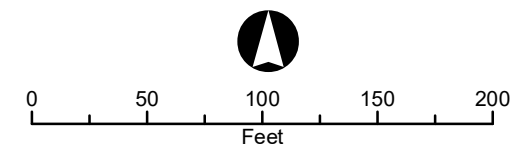
Date: August 27, 2020

ATTACHMENT B
MPR-8 Figure

SOCRE PROJECT
MPR-8 Location 18 & 19
San Juan Capistrano
Orange County, CA

LEGEND

-  Existing Underground Vault
-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
-  USACOE - Jurisdictional Extent
-  CDFW - Jurisdictional Extent
- MPR-8 Components**
-  Approximate Locations of anchors
- NTP-6 Components**
-  New Transmission Cable Pole
-  Remove Existing Structure
-  230 kV Overhead Transmission Line
-  230 kV Underground Transmission Line
-  Existing Overhead Transmission Line to be Removed
-  BMP Feature
-  Work Pad
- Temporary Work Areas:**
-  Guard Structure
-  Pulling/Stringing Site
-  Work Area



ATTACHMENT C
MPR-8 Site Photographs

Scaffold Structure

View of approximate locations of anchors in relation to poles 18 & 19, facing N. See following Photos 1 and 2 for close-up images of proposed temporary disturbance areas.

Guy Wire

Approximate anchor Location

19

18

Photo 2

Photo 1

Approved Work Area

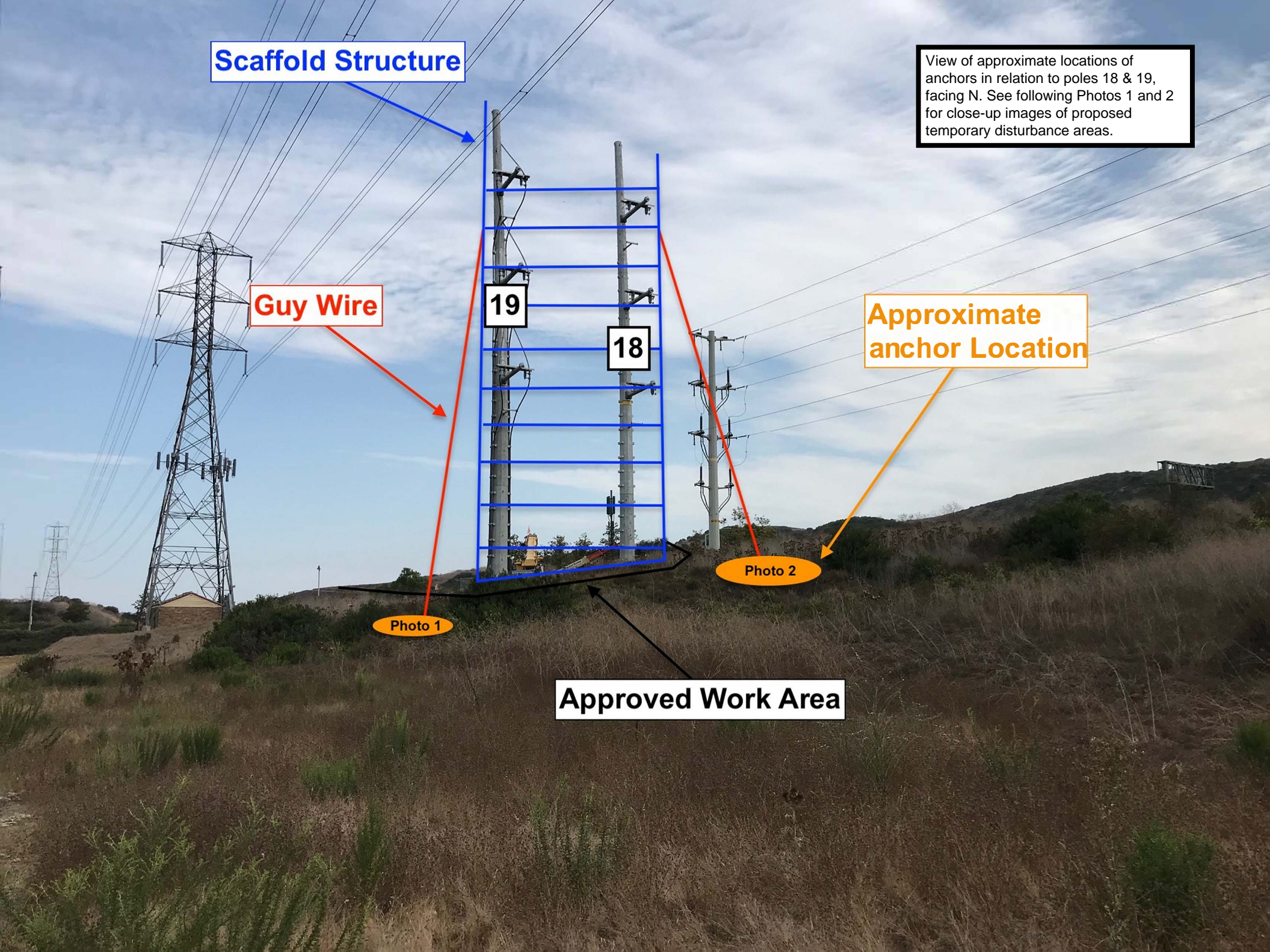


Photo 1

19

18

Proposed
anchor for 19

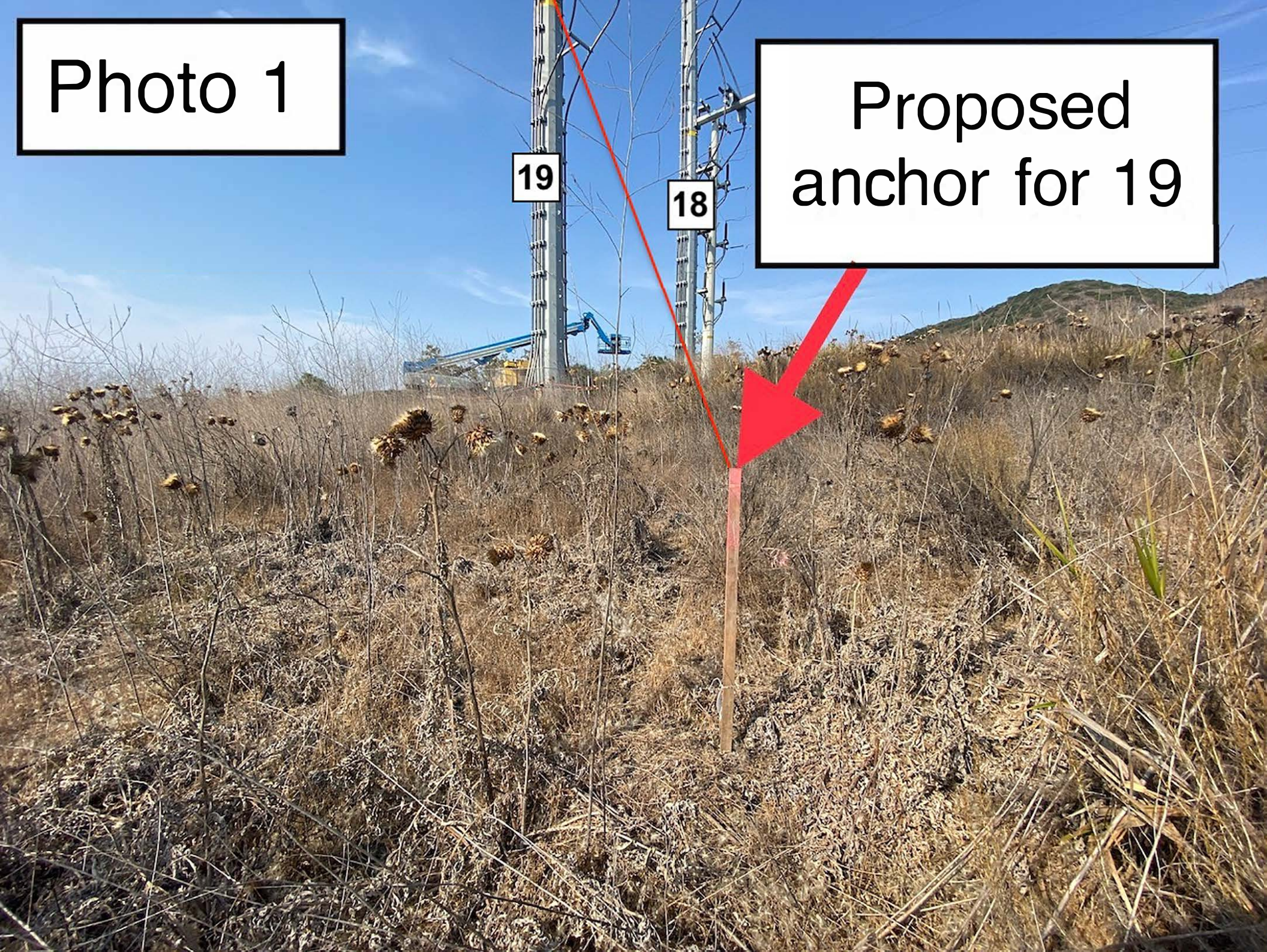


Photo 2

Proposed
anchor for 18

19

18

