



Richard Quasarano
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September 11, 2020

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

Re: Minor Project Refinement No. 9 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. 9 (MPR-9) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-9 will authorize the use of a temporary work area adjacent to the access road north of transmission standard pole #30 (Location 30), previously approved in Notice to Proceed No. 6 (NTP-6). The temporary work area would be used for the installation of an anchoring system for Location 30. The requested additional work area will total 1,200 square feet, or .03 acres. The requested MPR-9 work area is located entirely within the SDG&E right-of-way (ROW) in San Clemente and will be used to facilitate wire stringing activities for Location 30. Please refer to **Attachment B, MPR-9 Figure** and **Attachment C, MPR-9 Site Photograph** to view the MPR-9 work area.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-9 Figure

Attachment C: MPR-9 Site Photograph

Description of MPR-9 Workspace and Activities

As mentioned above, MPR-9 would authorize SDG&E to use a new temporary work area (totaling 1,200 square-feet) adjacent to the access road north of Location 30. The additional work area is necessary to install an anchoring system for Location 30, anticipated to be a stub pole and anchor in the locations shown on **Attachment C, MPR-9 Figure**. This will ensure that the weight of the wire on the south side of the pole will not cause the pole to be pulled over. Vegetation removal will not be necessary as the property owners recently mowed the area for fire mitigation. It is anticipated that the stub pole will be set and removed with a line truck, and the holes for the stub pole and anchor will be dug with a digger derrick truck. An SDG&E Field Construction Advisor will monitor the line truck activities to ensure all safety precautions are taken to avoid the minimum approach distance (MAD) from energized lines.

The MPR-9 work area is anticipated to be utilized for one month and activities will begin immediately following MPR-9 approval. Following the use of the MPR-9 temporary work area, the area will be restored to pre-Project conditions in compliance with APM AES-2, MM AES-2 and the Project's Storm Water Pollution Prevention Plan (SWPPP) based on pre-Project photo documentation by SDG&E, and in coordination with the property owner.

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-9 work area.

MPR-9 Request for Approval

SDG&E respectfully requests approval of MPR-9 to utilize the new temporary work area for installation of an anchoring system to facilitate wire pulling activities at Location 30 by September 11, 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-9 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: September 04, 2020

Report No.: 9

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 9 (MPR-9) temporary work area is entirely within SDG&E right-of-way (ROW).

Location/Milepost: The MPR-9 temporary work area is located north of new transmission standard pole #30 (Location 30) in the City of San Clemente.

Land Use/Vegetative Cover: The 1,200-square foot MPR-9 work area (0.03-acre) is entirely within disturbed habitat.

Sensitive Resources: There are no sensitive resources in the MPR-9 temporary work area. See resource discussions below.

Modification From:

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

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-9 for a new temporary work area to be used as a turn-around area for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area is located adjacent to the access road north of Location 30, previously approved in Notice to Proceed No. 6 (NTP-6). The new MPR-9 work area will total approximately 1,200 square feet (0.03 acre).

The additional work area is necessary to install an anchoring system for Location 30, anticipated to be a stub pole and anchor in the locations shown on Attachment C, MPR-9 Figure. This will ensure that the weight of the wire on the south side of the pole will not cause the pole to be pulled over. Vegetation removal will not be necessary as the property owners recently mowed

the area for fire mitigation. It is anticipated that the stub pole will be set and removed with a line truck, and the holes for the stub pole and anchor will be dug with a digger derrick.

The MPR-9 work area is anticipated to be utilized for one month and activities will begin immediately following MPR-9 approval. Following the use of the MPR-9 temporary work area, the area will be restored to pre-Project conditions in compliance with APM AES-2, MM AES-2 and the Project's Storm Water Pollution Prevention Plan (SWPPP) based on pre-Project photo documentation by SDG&E, and in coordination with the property owner.

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 an anchoring system at location 30 to complete construction activities. However, since the MPR-9 work area is located immediately adjacent to the approved access road, it is within the geographic study area of the FEIR, and therefore, has been previously analyzed.

Justification for Change: Following constructability review in the field, the construction contractor identified the need to gain access to the MPR-9 work area in order to facilitate wire pulling activities at Location 30. The installation of an anchoring system is necessary to ensure the weight of the wire on the south side of the pole will not cause the pole to become unstable.

Maps & Figures: Refer to **Attachment B, MPR-9 Figure**, for a map of the proposed MPR-9 temporary work area location. Refer to **Attachment C, MPR-9 Site Photograph**, for a picture of the current conditions within the MPR-9 temporary work area.

Environmental Impact: Utilization of the MPR-9 work area 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-9 temporary work area is anticipated to increase the total temporary impact area for the Project by approximately 0.03 acre of disturbed habitat that contains no sensitive resources. Following the use of the MPR-9 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 the property owner. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed work area for MPR-9 is located immediately adjacent to the previously approved access road, and the new temporary work area is 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. Consistent with Section 4.4 of		

the FEIR, no sensitive biological resources are present within the MPR-9 work area. A pre-construction survey was conducted for the MPR-9 work area on September 1, 2020 which encompassed the MPR-9 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-9 work area was consistent with the results provided in previous biological studies. The work area is entirely within disturbed habitat which contains no sensitive vegetation.

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-9 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 known sensitive cultural resources within the MPR-9 work area.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None, the MPR-9 work area was not anticipated to be required for Project construction.

New disturbance acreage: 0.03 acre of temporary impact area.

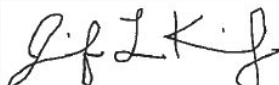


CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	<input checked="" type="checkbox"/> Y	The ground-disturbing activities that would take place to dig the holes to install the anchoring system in the MPR-9 work area would not result in a new significant impact or a substantial increase in the severity of any previously identified significant impacts to geology, soils, or seismicity. MPR-9 does not involve the installation of any new permanent facilities or performance of any new activities. Accordingly, utilization of the new temporary work area would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary work area 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-9 does not involve the installation of any new permanent facilities or performance of any new activities. 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. The Applicable APMs and MMs relating to hazardous materials that
	<input checked="" type="checkbox"/> N	

		<p>would be applied to NTP-6, would apply to the MPR-9 work area, and would be implemented to mitigate for impacts related to hazardous materials.</p> <ul style="list-style-type: none"> • APM HAZ-3: Personal Protection Equipment • APM HAZ-5 Recycling and Reuse • APM HAZ-6: Fire Control • MM HAZ-3: Worker Safety Training
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary work area 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 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. The Applicable APMs and MMs relating to hydrology and water quality that would be applied to NTP-6, would apply to MPR-9, 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 • MM WQ-1: Pesticide Application
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" 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-9 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-9 work area. Although ground-disturbing activities will take place within the MPR-9 work area, the work area is not within 100 feet of a cultural Environmentally Sensitive Area, therefore cultural monitoring is not required (Refer to Section 6 in the Cultural Resources Construction Monitoring Plan). 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-9 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</p>
	<input type="checkbox"/> N	

		<p>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. Paleontological monitoring will take place during MPR-9 ground-disturbing activities at the discretion of the Qualified Paleontological Consultant as the work area is located in a landslide deposit with undetermined potential. No new or altered APMs or MMs would be required, and the following APMs would be implemented for MPR-9 work activities:</p> <ul style="list-style-type: none"> • APM CUL-8: Paleontological Monitoring • APM CUL-9: Discovery of Fossils
Agency Consultation?	<input type="checkbox"/> Y	The MPR-9 work area 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>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-9, 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-9 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-9 work activities:</p>
	<input checked="" type="checkbox"/> N	<ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area 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-9 temporary work area 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 or equipment proposed as part of this MPR-9 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input checked="" type="checkbox"/> 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 already analyzed in the Project's FEIR, Section 4.11, as there are no new activities proposed as part of this MPR-9 request, and the activities performed will be short in duration and produce less noise than transmission pole installation activities. In addition, MPR-9 activities will take place during San Clemente's

	<input type="checkbox"/> N	designated construction hours. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-9 work activities: <ul style="list-style-type: none"> • APM NOISE-1: Nighttime and Weekend Activities • MM NV-3: Construction Vibration Control Measures
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-9 work area. The stub pole would be approximately 30 feet tall, and will not be readily viewed by most nearby residents, however it will be visible to a few residents. The anchoring system would only be utilized for wire pulling activities and would be removed following its use, therefore use of the MPR-9 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.
	<input type="checkbox"/> N	The MPR-9 work area would be restored to pre-Project conditions upon completion of Project activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-9 work activities: <ul style="list-style-type: none"> • APM AES-1: Clean Work Area • APM AES-2: Restoring Disturbed Area • MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	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 1,200 square feet) occurs within disturbed habitat and does not include any sensitive biological resources as described in the Project's FEIR Section 4.4. No vegetation removal is required for MPR-9 activities.
	<input type="checkbox"/> N	Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-9 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:

		<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.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new temporary work area would not require agency consultation relating to vegetation and wildlife.

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	9/11/2020	Jennifer Kaminsky		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	9/11/2020	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	9/11/20	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-9 (i.e., use a new temporary work area adjacent to the access road north of Location 30 and installation of an anchoring system, anticipated to be a stub pole and anchor, to facilitate wire stringing activities for Location 30) will be limited to the approximate locations shown on the figure titled "SOCRE PROJECT, MPR-9 Location 30". Within two weeks following placement of the anchoring system, SDG&E will submit a map to the CPUC showing the final locations of the anchoring system items within the temporary work area.

COA-2. MPR-9 activities will occur only within the SDG&E right-of-way.

COA-3. Work activities for MPR-9 will adhere to all applicable safety requirements for work occurring under and near existing overhead power lines.

COA-4. Work activities for MPR-9 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 temporary work area and anchoring system for Location 30 described for MPR-9 will be in place for approximately one month. If SDG&E determines it is necessary to maintain use of the work area and anchoring system beyond approximately one month, 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 one-month period.

















COA-6. For any ground disturbance that occurs during placement or removal of the anchoring system, 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 anchoring system.

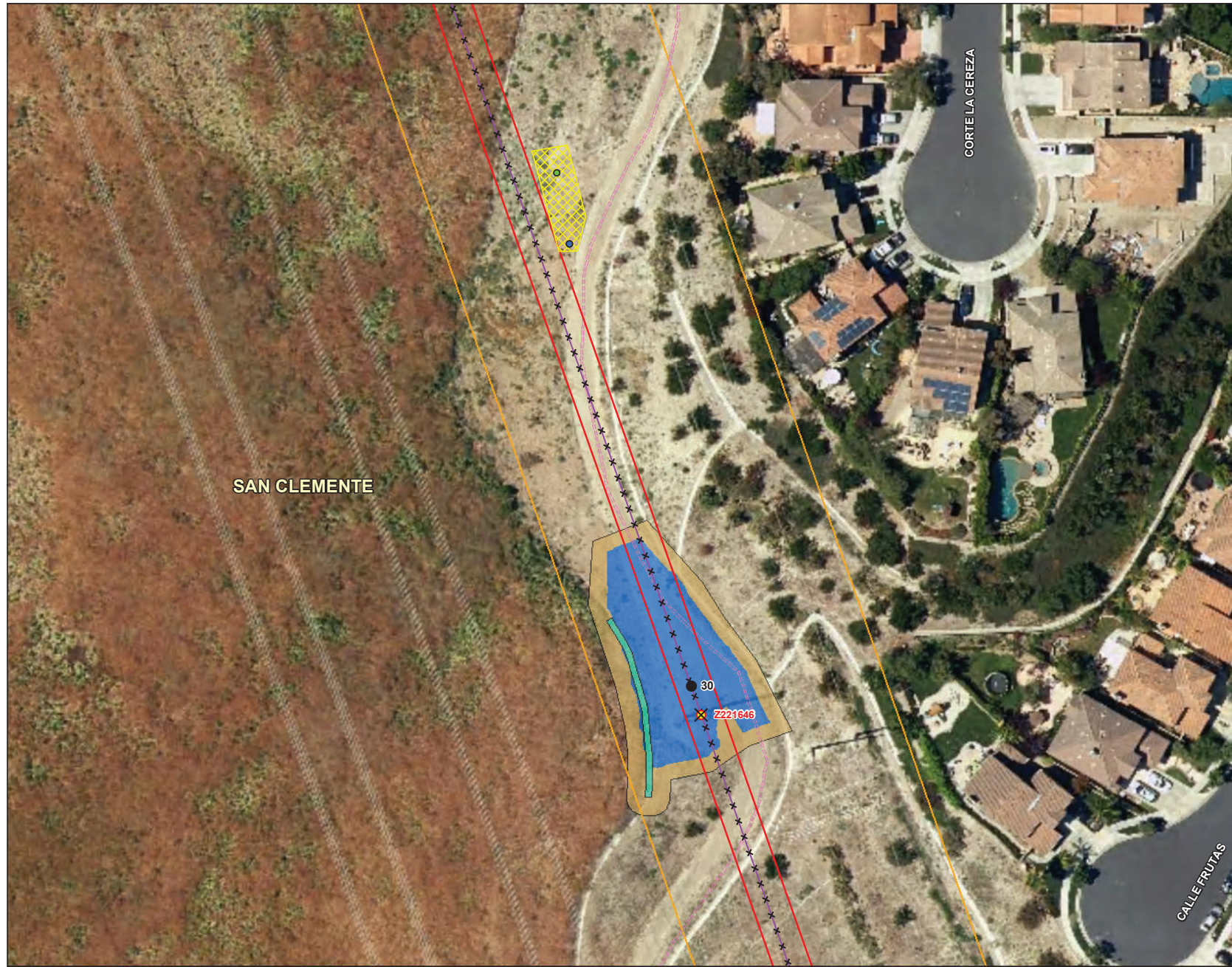
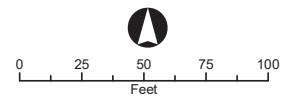
Prepared by: Joe Donaldson, WSP (formerly E&E), CPUC Compliance Manager Date: September 10, 2020

ATTACHMENT B
MPR-9 Figure

SOCRE PROJECT
MPR-9 Location 30
San Clemente
Orange County, CA

LEGEND

-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
-  SDG&E Existing ROW Limits
- MPR-9 Components**
-  Approximate Location of Stub Pole
-  Approximate Location of Anchor
-  Temporary Work Area
- NTP-6 Components**
-  New Transmission Cable Pole
-  Remove Existing Structure
-  230 kV Overhead Transmission Line to be Removed
-  Existing Overhead Transmission Line to be Removed
-  Existing Access Road
-  BMP Feature
-  Work Pad
-  Temporary Work Area



ATTACHMENT C
MPR-9 Site Photograph

Transmission Pole Location 30

View of approximate locations of stub pole, guy wires and anchor rod in relation to transmission pole at location 30

Guy Wire

Adequate Clearance

Stub Pole

Guy Wire

Ground Disturbance

Anchor Rod

