



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

September 29, 2020

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

Re: Minor Project Refinement No. 10 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. 10 (MPR-10) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-10 will authorize the use of two temporary work areas for access road improvements near Pico Substation and transmission pole #41. The temporary work areas would be utilized in order to provide adequate equipment access for transmission line construction. The requested additional work areas will total 2,385 square feet, or .05 acres and are located in San Clemente. Please refer to **Attachment B, MPR-10 Figure** and **Attachment C, MPR-10 Site Photographs** to view the MPR-10 work areas.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-10 Figure

Attachment C: MPR-10 Site Photographs

Description of MPR-10 Workspace and Activities

As mentioned above, MPR-10 would authorize SDG&E to use two new temporary work areas (totaling 2,385 square-feet) required for access road improvements. The additional work areas are necessary to provide safe and practical access for transmission line construction, primarily transmission pole #38 east to Talega Substation.

Access road improvements at Location 1 between Pico Substation and transmission pole #38 will include mowing vegetation for fire mitigation, and minor grading of the berm. Access road improvements at Location 2 at the access road entrance off of Calle Avanzado, north of transmission pole #41, will include replacement of the existing bridge with a wider, temporary bridge and earthwork (grading and adding fill material) to increase the width of the access road to approximately 14 feet wide and create an approximate 2:1 slope. SDG&E has rights to make

improvements to the access roads and will coordinate with the property owner regarding restoration of the landscaping after construction is complete.

The access road improvements are required for larger equipment to maneuver along the roads, for example during transportation of new poles, steel beams, and retaining wall materials (See **Attachment B, MPR-10 Figure**). These two locations are critical for transmission line construction as there are very few access road entrances that lead to work areas in the Talega Hub and Corridor. All other viable access points would also require road improvements for larger equipment, and the MPR-10 areas were determined to be the least impactful options.

The MPR-10 work areas are anticipated to be utilized throughout transmission line construction in the Talega Hub for the Project (anticipated through 2023) and activities will begin immediately following MPR-10 approval. Following the use of the MPR-10 temporary work areas, the areas will be restored / revegetated 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 owners.

Preconstruction Requirements and Permit/Approvals

The MPR-10 activities described above are being requested for approval in accordance with the NTP-6 Approval Letter dated October 30, 2019, specifically Conditions of Approval (COAs) No. 10 and 16. Approval of MPR-10 will require an exception to COA-15, "No new access roads will be constructed and improvements to existing access roads will not include widening or realignment of roads." MPR-10 activities will not 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 or approvals are required for this work.

MPR-10 Request for Approval

SDG&E respectfully requests approval of MPR-10 to utilize the new temporary work areas for access road improvements, by October 1, 2020. 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-10 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 29, 2020

Report No.: 10

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 10 (MPR-10) temporary work areas are located along utility access roads that lead to the transmission line right-of-way (ROW). The property owners were notified of access road improvements.

Location/Milepost: The MPR-10 temporary work areas are located south of Pico Substation (Location 1) and north of pole #41 (Location 2) in the City of San Clemente.

Land Use/Vegetative Cover: The work areas total 2,385 square feet (0.05-acre) and are entirely within disturbed / landscaped land.

Sensitive Resources: There are no sensitive resources in the MPR-10 temporary work 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 MPR-10 for access road improvements in two work areas for the South Orange County Reliability Enhancement Project (SOCRE or Project). The activities described herein are being requested in accordance with the NTP-6 Approval Letter dated October 30, 2019, specifically Conditions of Approval (COAs) No. 10 and 16. Approval of MPR-10 will require an exception to COA-15, "No new access roads will be constructed and improvements to existing access roads will not include widening or realignment of roads." The temporary work areas are located south of Pico Substation, near transmission pole #38 (Location 1) and north of transmission pole #41 (Location 2). The new MPR-10 work areas will total approximately 2,385 square-feet (0.05 acre).

The additional work areas are necessary to provide safe and practical access to complete transmission line construction activities, primarily for transmission pole #38 to Talega Substation. Access road improvements at Location 1 between Pico Substation and transmission pole #38 will include mowing vegetation for fire mitigation, and minor grading of the berm. Access road improvements at Location 2 at the access road entrance off of Calle Avanzado, north of transmission pole #41, will include replacement of the existing bridge with a wider, temporary bridge and earthwork (grading and adding fill material) to increase the width of the access road to approximately 14 feet wide and create an approximate 2:1 slope. SDG&E has rights to make improvements to the access roads and will coordinate with the property owner regarding restoration of the landscaping and bridge after construction is complete.

The access road improvements are required for larger equipment to maneuver along the roads, for example during transportation of new poles, steel beams, and retaining wall materials. These two locations are critical for transmission line construction as there are very few access road entrances that lead to work areas in the Talega Hub and Corridor. All other viable access points would also require road improvements for larger equipment, and the MPR-10 areas were determined to be the least impactful options.

The MPR-10 work areas are anticipated to be utilized throughout transmission line construction in the Talega Hub for the Project (anticipated through 2023) and activities will begin immediately following MPR-10 approval. Following the use of the MPR-10 temporary work areas, the areas will be restored and revegetated 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 owners. Native vegetation will be used for revegetation of disturbed areas if practical and if it does not interfere with the property owner's preferences for revegetation.

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 access road improvements in these locations to complete construction activities. However, since the MPR-10 work areas are located adjacent to the Project alignment, they are within the geographic study area of the FEIR, and therefore, have been previously analyzed.

Justification for Change: Following constructability review in the field, the construction contractor identified the need to perform access road improvements within the MPR-10 work areas in order to facilitate transmission line construction activities. These two locations are critical for transmission line construction as there are very few access road entrances that lead to work areas in the Talega Hub and Corridor. Alternative access road improvements were considered and these two locations were determined to be the least impactful options.

Maps & Figures: Refer to **Attachment B, MPR-10 Figure**, for a map of the proposed MPR-10 temporary work area locations. Refer to **Attachment C, MPR-10 Site Photographs**, for pictures of the current conditions within the MPR-10 temporary work areas.

Environmental Impact: Utilization of the MPR-10 work areas for access road improvements 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-10 temporary work areas is

anticipated to increase the total temporary impact area for the Project by approximately 0.05 acre of disturbed / landscaped habitat that contains no sensitive resources. Following the use of the MPR-10 temporary work areas, the areas will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with the property owners. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed work areas for MPR-10 are 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.

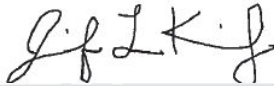


<u>Resources:</u>			
Biological	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference: Biological resources along the Project alignment were studied, 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-10 work areas. A pre-construction survey was conducted for the MPR-10 work areas on September 21, 2020. No suitable habitat for special-status species was identified during the survey. The Project biologist verified that the current condition of the MPR-10 work areas was consistent with the results provided in previous biological studies.			
Cultural	<input type="checkbox"/> No Resources Present	<input checked="" type="checkbox"/> Resources Present	<input type="checkbox"/> 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-10 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). Location 2 is located partially within a known cultural Environmentally Sensitive Area (ESA). There are no known sensitive cultural resources within the Location 1 work area.			
<u>Disturbance Acreage Changes:</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Original disturbance acreage: None, the MPR-10 work area was not anticipated to be required for access road improvements.			
New disturbance acreage: 0.05 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 access road improvement activities that would take place within the MPR-10 work areas 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-10 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 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 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	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 work areas would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology	<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 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-10 area, and would be implemented to mitigate for impacts related to hydrology and water quality. The drainage ditch located adjacent to Location 2 would be protected during access road improvement activities using trench plates along the bridge and structural BMPs along the slope area (Attachment C, MPR-10 Site Photographs). The drainage ditch is not a jurisdictional water feature. <ul style="list-style-type: none"> • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well • MM WQ-1: Pesticide Application
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work areas 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 the MPR-10 temporary work areas. Review of the Project's previous cultural resources survey reports (prepared for the PEA) determined that Location 2 is partially within a cultural ESA. The Location 2 work area is entirely previously disturbed, however cultural monitoring will take place for initial disturbance, and will continue at the discretion of the Qualified Cultural Consultant (refer to Section 6 in the Cultural Resources Construction Monitoring Plan). Cultural monitoring will not be required during access road improvement work at Location 1 as there are no cultural ESAs within 100 feet. 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-10 work activities:</p> <ul style="list-style-type: none"> • APM CUL-1: Worker Training for Cultural Resources • APM CUL-2: Cultural Resource Monitoring • APM CUL-3: Avoid Known Cultural Resources • APM CUL-4: Unanticipated Cultural Finds • APM CUL-5: Curate Cultural Discoveries • APM CUL-6: Archaeological Monitoring Results Report • APM CUL-7: Monitoring by Native Americans • MM CUL-1: Supplemental Worker Training for Cultural Resources
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The MPR-10 work 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	Access road improvements within the new temporary work 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. There would be no additional construction crews or change in equipment utilized for MPR-10, that would not already be accounted for in the FEIR. Also, the access roads are already utilized for utility ROW access, and the public roads where the access road entrances are located are not arterial roads that have through traffic or high traffic volumes.
	<input checked="" type="checkbox"/> N	No new or significant increase to previously identified significant impacts would occur as a result of the MPR-10 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-10 work activities: <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work 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-10 temporary work 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 or equipment proposed as part of this MPR-10 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work 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 work 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-10 request, nor are there any activities expected to take place outside of designated construction hours.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work areas 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-10 work areas. At Location 2, the bridge will be removed and replaced with a temporary bridge consisting of steel plates and steel beams.

	<input type="checkbox"/> N	<p>Following completion of the Project, the bridge will be restored to the original or better condition than the existing bridge.</p> <p>Both of the MPR-10 work areas would be restored and revegetated to pre-Project conditions as required and in coordination with the property owners upon completion of Project activities. Use of the MPR-10 work 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-10 work activities:</p> <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	<p>The new temporary work areas would not require agency consultation relating to visual resources.</p>
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>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 areas (totaling 2,385 square feet) occur within disturbed / landscaped land and do not include any sensitive biological resources. Vegetation will be mowed within the Location 1 work area for fire suppression, and some grading will occur. Landscaped vegetation is anticipated to be removed within the Location 2 work area.</p> <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of MPR-10 activities, 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	<p>The new temporary work area would not require agency consultation relating to vegetation and wildlife.</p>
	<input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	10/1/2020	Jennifer Kaminsky		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	10/1/2020	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	9/30/20	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-10 (i.e., use of two temporary work areas for access road improvements near Pico Substation and transmission pole #41) will be limited to the approximate locations shown on the figure titled "SOCRE PROJECT, MPR-10 Figure 1".

COA-2. MPR-10 activities will occur only within the SDG&E right-of-way or property for which SDG&E has rights to make improvements to the access roads. SDG&E will provide the CPUC with proof of its rights agreed to by the property owner(s) for accessing and improving access roads on the subject properties prior to beginning construction activities on the subject properties.

COA-3. Work activities for MPR-10 will adhere to all applicable conditions of approval identified for approved project NTPs, inclusive of NTP-6 as modified by approval of MPR-10, and all applicable Mitigation Measures and Applicant Proposed Measures identified for the project in the Mitigation, Monitoring, Compliance, and Reporting Program Compliance Plan.

COA-4. Immediately following completion of use of the MPR-10 temporary work areas, SDG&E will, in coordination with the property owners, initiate restoration of the landscaping and bridge at Location 2 and restoration / revegetation of the areas 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.

COA-5. At the discretion of the Qualified Cultural Consultant, SDG&E will demarcate the ESA, or the portion of the ESA adjacent to the Location 2 temporary work area, and place signage identifying it as an ESA. The Qualified Cultural Consultant will determine the type and extent, if any, of demarcation and identification appropriate for the ESA.

COA-6. SDG&E will conduct cultural monitoring during initial ground disturbance at the Location 2 work area and will continue cultural monitoring at this location at the discretion of the Qualified Cultural Consultant.

COA-7. SDG&E will conduct paleontological monitoring during MPR-10 ground-disturbing activities at the discretion of the Qualified Paleontological Consultant.

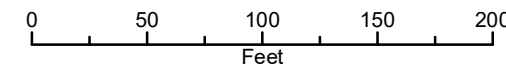
Prepared by: Joe Donaldson, WSP (formerly E&E), CPUC Compliance Manager Date: 9/29/20

ATTACHMENT B
MPR-10 Figure



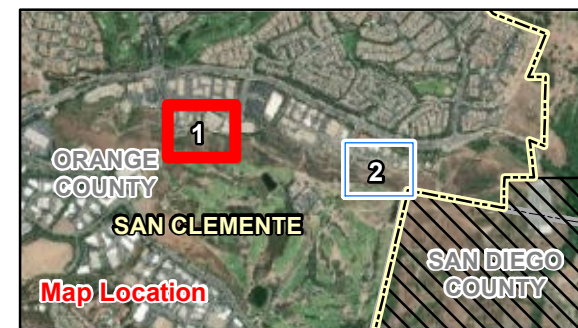
LEGEND

- County Boundary
- Municipal Boundary
- Existing SDG&E Easement
- MCB Camp Pendleton
- MPR-10 Components**
- Work Area / Access Road Improvement
- Proposed Project**
- New Transmission Standard Pole
- New Transmission Standard Pole (for Reference Only)
- Remove Existing Structure
- 230 kV Overhead Transmission Line
- Existing Overhead Transmission Line to be Removed
- Overhead ADSS Fiber Cable
- Underground ADSS Fiber Cable
- Existing Fiber Cable Connection to be Removed
- Existing Access Road
- Work Pad
- Temporary Work Areas:**
- Work Area



Data Sources: ESRI, Orange Co., SANDAG, SanGIS, SDG&E, USDA.
 SPCS NAD83 CA Zone VI Feet.
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 SJW 9-23-20

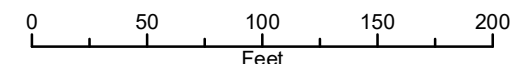
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LEGEND

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- Overhead ADSS Fiber Cable
- Underground ADSS Fiber Cable
- Existing Fiber Cable Connection to be Removed
- Existing Access Road
- Work Pad
- Temporary Work Areas:**
- Work Area



Data Sources: ESRI, Orange Co., SANDAG, SanGIS, SDG&E, USDA.
 SPCS NAD83 CA Zone VI Feet.
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 SJW 9-23-20



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MCB CAMP PENDLETON

ATTACHMENT C
MPR-10 Site Photographs

View of Location 1 work area for access road improvement.



Location #1 Looking East



Location #1 Looking South

View of Location 2 access road improvement work area, facing SE.

