

## 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: December 2, 2020			<b>кероп no.:</b> 13			
Date Approved: TBD			<b>Approval Agency:</b> California Public Utilities Commission (CPUC).			
Property Owner(s): The Minor Project Refinement No. 13 (MPR-13) temporary work area is located entirely within the SDG&E right-of-way (ROW).			<b>Location/Milepost:</b> The MPR-13 temporary work area is located southeast of Location 42 in the City of San Clemente.			
Land Use/Vegetative Cover: The approximately 3,325-square foot MPR-13 work area (0.08 acre) is entirely within disturbed habitat. Access roads / bare ground make up approximately .03-acre of the work area.			<b>Sensitive Resources:</b> There are no sensitive resources in the MPR-13 temporary work area. See resource discussions below.			
Modification From:	☐ Permit ☐ Mitigation Measure	☐ Plan/Prod ☐ Other:	cedure Specification Drawing			

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-13 for a new temporary work area to be used as a stringing site for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area spans across the access roads southeast of Location 42, previously approved in Notice to Proceed No. 6 (NTP-6) Addendum No. 1. The new MPR-13 work area will be approximately 3,325 square feet (0.08 acre).

The additional work area is necessary to safely string conductor between Locations 36 and 42 and is anticipated for use for temporary laydown during transmission line construction. After constructability review in the field, it was determined that a stringing site would be required in the MPR-13 location in order to properly install the conductor. An SDG&E Field Construction Advisor will monitor the wire pulling activities to ensure all safety precautions are taken to avoid

the minimum approach distance (MAD) from energized lines. No ground disturbance is anticipated to be required during MPR-13 activities. Some trimming (mowing) will be required for vegetation within the work area. Drive and crush methods will be employed when possible. The MPR-13 work area will be utilized during wire stringing activities anticipated to begin immediately following MPR-13 approval for approximately 2 weeks. The MPR-13 temporary work area will be utilized periodically for laydown of construction components and temporary parking of construction vehicles and equipment during the Project's transmission line construction, anticipated to be completed by the end of 2023. **Attachment B, MPR-13 Figure** shows the location of the MPR-13 temporary work area.

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

<u>Original Condition</u>: The Project's Final Environmental Impact Report (FEIR) did not identify the need for a stringing site in the MPR-13 location. However, the MPR-13 work area is located within the geographic study area of the FEIR, and therefore has been previously analyzed.

<u>Justification for Change</u>: Following constructability review in the field, the construction contractor identified the need to gain access to the MPR-13 work area in order to facilitate stringing activities between transmission standard poles #36 and #42.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-13 Figure**, for a map of the proposed MPR-13 temporary work area location. Refer to **Attachment C, MPR-13 Site Photographs**, for pictures of the current conditions within the MPR-13 temporary work area.

Environmental Impact: Utilization of the MPR-13 temporary work area as a stringing site 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-13 temporary work area is anticipated to increase the total temporary impact area for the Project by approximately 0.05 acre of disturbed habitat that contains no sensitive resources. The approximately .03 acre of access roads within the work area is not factored into this total since it was previously accounted for in the FEIR. Specific discussions for each resource area are provided below.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the proposed work area for MPR-13 is located immediately adjacent to the previously approved access road, and the new stringing site is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:						
Biological	$\boxtimes$	No Resources		Resources		N/A, Change would
3 3		Present	_	Present	_	not affect resources
Previous Biologica						
Biological resources	alo	ng the Project al	ignm	ent were studie	ed, revie	ewed, and documented
as part of SDG&E's	app	lication for a Cer	tificat	e of Public Ne	cessity (	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-13 work area. A pre-						
1		•		•		ovember 23, 2020. No

suitable habitat for special-status species was identified during the survey. The Project biologist verified that the current condition of the MPR-13 work area was consistent with the results provided in previous biological studies. The work area is entirely within disturbed habitat. Access roads / bare ground make up approximately .03 acre of the MPR-13 work area.						
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-13 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-13 work area.						
Disturbance Acreage Changes:   ☐ Yes ☐ No						
Original disturbance acreage: The MPR-13 work area was not anticipated to be required for Project construction, however the existing access roads within the work area account for approximately .03 acre out of the .08-acre work area.  New disturbance acreage: 0.05 acre of temporary disturbance to previously disturbed habitat.						

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 ⊠ N	MPR-13 does not involve the installation of any new facilities of performance of any new activities, nor are any ground disturbing activities anticipated. 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.
Agency Consultation?	<ul><li>□ Y</li><li>⊠ N</li></ul>	The proposed temporary work area would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	□ Y ⊠ N	MPR-13 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?	<ul><li>□ Y</li><li>⊠ N</li></ul>	The proposed temporary work area would not require agency consultation relating to hazards or hazardous materials.

Hydrology	⊠ Y	The jurisdictional water feature to the south of the MPR-13 work area is within 200 feet of the work area. In accordance with MM BR-1, a 50-foot exclusionary buffer will be maintained while the work area is being utilized.				
	□N	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.				
Agency Consultation?	<ul><li>□ Y</li><li>⋈ N</li></ul>	The new temporary work area would not require agency 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-13 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-13 work area. No ground disturbing activities are proposed and the				
	⊠ N	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-13 work activities:				
		<ul> <li>APM CUL-1: Worker Training for Cultural Resources</li> <li>MM CUL-1: Supplemental Worker Training for Cultural Resources</li> </ul>				
		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-13 work area, therefore paleontological monitoring will not be required.				
Agency Consultation?	<ul><li>□ Y</li><li>⊠ N</li></ul>	The MPR-13 work area would not require agency or tribal consultation in relation to cultural or paleontological resources.				

Traffic and Circulation	□ Y	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-13, that would not already be accounted for in NTP-6 and NTP-6 Addendum No. 1.  No new or significant increase to previously identified significant impacts would occur as a result of the MPR-13 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-13 work activities:  • APM TR-4: Off Peak Deliveries
Agency Consultation?	□ Y □ N	The new temporary work area would not require agency consultation relating to traffic and circulation.
Air Quality	□ Y ⊠ N	The use of the MPR-13 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-13 request.
Agency Consultation?	<ul><li>□ Y</li><li>⊠ N</li></ul>	The new temporary work area would not require agency consultation relating to air quality.
Noise and Vibration	ΠΥ	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
	⊠ N	are no new activities proposed as part of this MPR-13 request. Also, the MPR-13 work area is not in the vicinity of any sensitive receptors. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-13 work activities:
		MM NV-3: Construction Vibration Control Measures
Agency Consultation?	□ Y 図 N	The new temporary work area would not require agency consultation relating to noise and vibration.

Aesthetics/ Visual Resources	<ul><li>□ Y</li><li>□ N</li></ul>	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-13 work area. The proposed work area spans across two existing utility access roads and does not contain any native vegetation or aesthetic resources. The work area also cannot be readily viewed from any public viewpoints. Therefore, use of the MPR-13 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. APM AES-2: Restoring Disturbed Areas and MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions, is applicable to MPR-13 even though there is no ground disturbance or vegetation removal anticipated since vegetation may be killed by compaction as a result of laydown activities. Vegetation trimming in the form of mowing and drive and crush will take place as necessary. No new or altered APMs or MMs would be required, and the following APMs and MM would be implemented for MPR-13 work activities:  • APM AES-1: Clean Work Areas • APM AES-2: Restoring Disturbed Areas • MM AES-2: Minimize Clearing and Ground Disturbance
Agency	ПΥ	The new temporary work area would not require agency
Consultation?	□ I	consultation relating to visual resources.
Vegetation and Wildlife	⊠ 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 (approximately 3,325 square feet) occurs within disturbed habitat and does not include any sensitive biological resources as described in the Project's FEIR Section
	□N	4.4. No tree removal or vegetation removal is proposed as part of MPR-13 activities. Vegetation trimming will take place as necessary by mowing and/or drive and crush. The vegetation that exists within the work area has a high concentration of nonnative, invasive species and does not contain any sensitive species. The jurisdictional water feature to the south of the MPR-13 work area is within 200 feet of the work area. In accordance with MM BR-1, a 50-foot exclusionary buffer will be maintained while the work area is being utilized.
		Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-13 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> <li>MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area.</li> <li>MM BR-2: Biological Monitoring.</li> </ul>	

		<ul> <li>MM BR-3: Preconstruction Surveys.</li> <li>MM BR-4: Limit Removal of Native Vegetation Communities and Trees.</li> <li>MM BR-6: Migratory Birds and Raptors Impact Reduction Measures.</li> <li>MM BR-9: Invasive Plant Control Measures.</li> </ul>			
Agency Consultation?	Y	The new temporary work area would not require agency			
Consultation?	⊠ N	consultation relating to vegetation and wildlife.			

Approvals	Date	Name (print)	Signa	ature		
San Diego Gas and Electric Project Manager		Jennifer Kaminsky			Reviewed	
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano			Reviewed	
CPUC Project Manager		Andrew Barnsdale			Approved Approved with conditions (see below) Denied	
For CPUC Compliance Manager Use Only						
☐ Refinement Appro	oved	Refinement Denied		☐ Beyond	Authority	
Conditions of Approval or Reason for Denial:						
Prepared by: Joe Donaldson, WSP, CPUC Compliance Manager Date: December 2, 2020						