



Richard Quasarano
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December 2, 2020

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

Re: Minor Project Refinement No. 13 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. 13 (MPR-13) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-13 will authorize the use of a temporary work area that spans the access roads southeast of Location 42 in the City of San Clemente. The temporary work area would be used to set up stringing equipment for wire pulling activities and laydown. The requested additional work area will be approximately 3,325 square feet, or .08 acre. Please refer to **Attachment B, MPR-13 Figure** and **Attachment C, MPR-13 Site Photographs** to view the MPR-13 work area.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-13 Figure

Attachment C: MPR-13 Site Photographs

Description of MPR-13 Workspace and Activities

As mentioned above, MPR-13 would authorize SDG&E to use a new temporary work area (approximately 3,325 square-feet) that spans across the access roads southeast of Location 42 approved in Notice to Proceed No. 6 (NTP-6) Addendum No. 1. The additional work area is necessary to safely string conductor between Locations 36 and 42 and is anticipated for use for temporary laydown during Phase II of transmission line construction which will be proposed under NTP-7. 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 also 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.

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's Notice to Proceed No. 6 (NTP-6) approval letter dated October 30, 2019, or NTP-6 Addendum No. 1 approval letter dated September 29, 2020, 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-13 work area.

MPR-13 Request for Approval

SDG&E respectfully requests approval of MPR-13 to utilize the new temporary work area as a stringing site and temporary laydown, by December 4, 2020 in accordance with NTP-6 Condition of Approval No. 10. 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-13 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: December 2, 2020

Report No.: 13

Date Approved: December 4, 2020

Approval Agency: 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).

Location/Milepost: 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.

Sensitive Resources: There are no sensitive resources in the MPR-13 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-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.

Original Condition: 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.

Justification for Change: 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.

Maps & Figures: 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.

Concurrence (if appropriate): 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.

<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-13 work area. A pre-construction survey was conducted for the MPR-13 work area on November 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.

Cultural No Resources Present Resources 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.

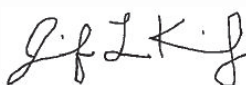

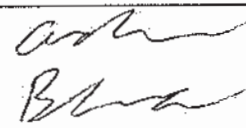

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn’t applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	<input type="checkbox"/> Y	MPR-13 does not involve the installation 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.
	<input checked="" 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-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.
	<input checked="" type="checkbox"/> N	
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 checked="" type="checkbox"/> 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.
	<input type="checkbox"/> 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?	<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 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-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 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:</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-13 work area, therefore paleontological monitoring will not be required.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The MPR-13 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-13, that would not already be accounted for in NTP-6 and NTP-6 Addendum No. 1.</p> <p>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:</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 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-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.
	<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 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 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-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:</p> <ul style="list-style-type: none"> • APM NOISE-1: Nighttime and Weekend Activities • MM NV-1: Nighttime and Weekend Construction Noise Controls • MM NV-3: Construction Vibration Control Measures
	<input checked="" type="checkbox"/> N	
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 type="checkbox"/> Y	<p>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:</p> <ul style="list-style-type: none"> • APM AES-1: Clean Work Areas • APM AES-2: Restoring Disturbed Areas • MM AES-2: Minimize Clearing and Ground Disturbance
	<input checked="" type="checkbox"/> N	
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	<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 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 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 non-native, 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.</p> <p>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:</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.
	<input type="checkbox"/> N	

		<ul style="list-style-type: none"> • 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	12/4/20	Jennifer Kaminsky		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	12/4/20	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	12/3/20	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 activities for MPR-13 (i.e., a new temporary work area southeast of Location 42 to be utilized for staging stringing equipment and temporary laydown) will be limited to the approximate location shown on the figure titled "SOCRE PROJECT, MPR-13 Location 42".

COA-2. MPR-13 activities will occur only within the SDG&E easement identified on the above referenced figure.

COA-3. Work activities for MPR-13 will adhere to all applicable safety requirements for work occurring under and near existing overhead power lines.

COA-4. Work activities for MPR-13 will adhere to all applicable conditions of approval identified for approved project NTPs, inclusive of NTP-6 Addendum 1, 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 MPR-13 temporary work area will be in place through completion of transmission line construction, anticipated to be completed by the end of 2023, and subject to all COAs applicable to current and future work for the project. If SDG&E determines it is necessary to maintain use of the temporary work area beyond this time, 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 approved use period.

COA-6. The temporary work area will be used only for the purposes identified in this request (i.e., wire stringing, and temporary laydown of construction materials, equipment storage, and parking of construction vehicles) and will not be used for other purposes. If SDG&E determines it necessary to use the temporary work area for purposes other than identified herein, SDG&E will request the use in writing, including a justification and time limit for such use, and receive written approval for the use and extension by the CPUC.

COA-7. Although no activities requiring ground disturbance or removal of vegetation are anticipated to occur, if either of these activities were to occur, or if vegetation on the site is severely damaged or killed, 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 completion of use of the temporary work area.

Prepared by: Joe Donaldson, WSP, CPUC Compliance Manager

Date: December 3, 2020

ATTACHMENT B
MPR-13 Figure

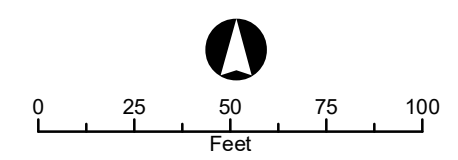
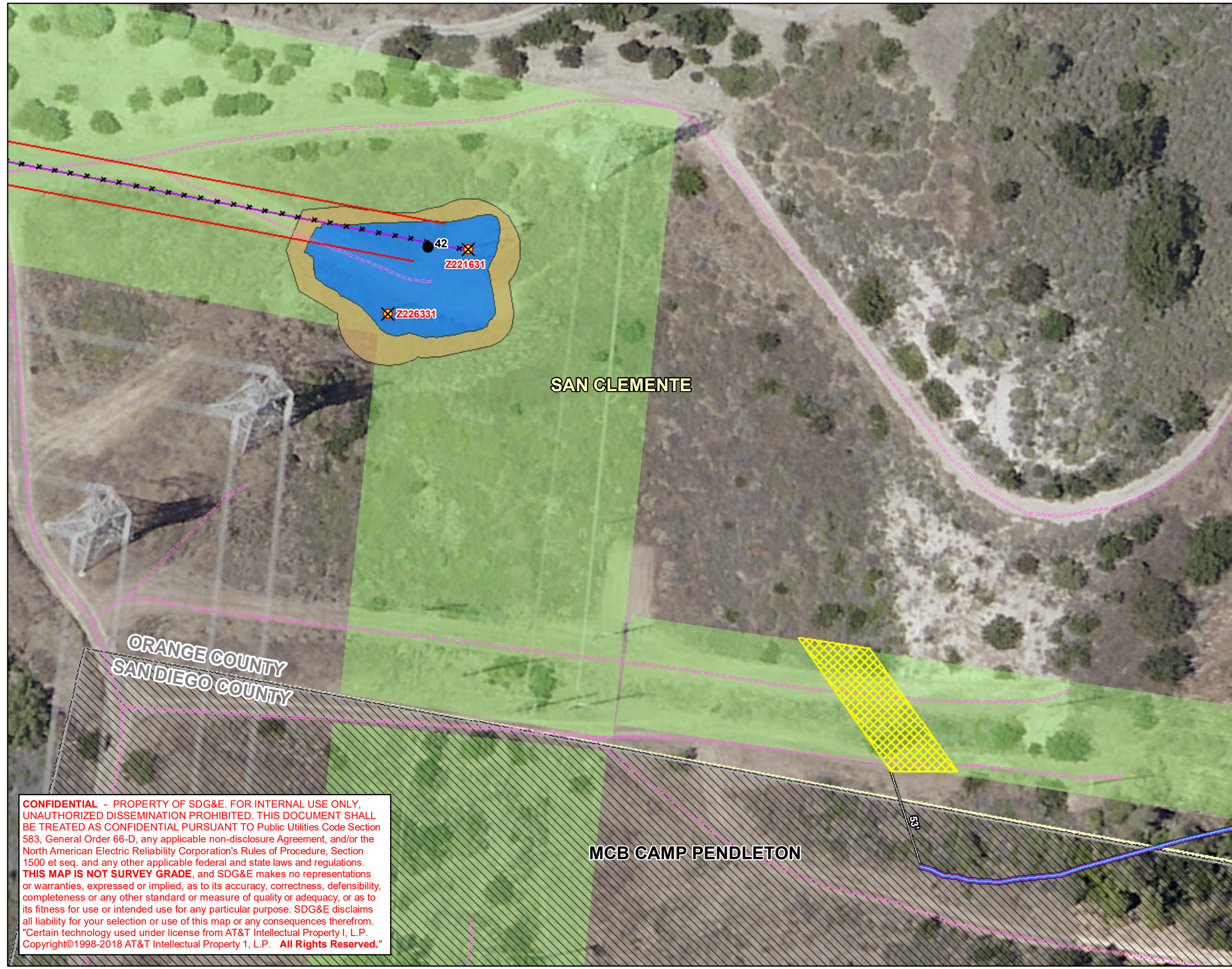
SOCRE PROJECT

MPR-13 Location 42

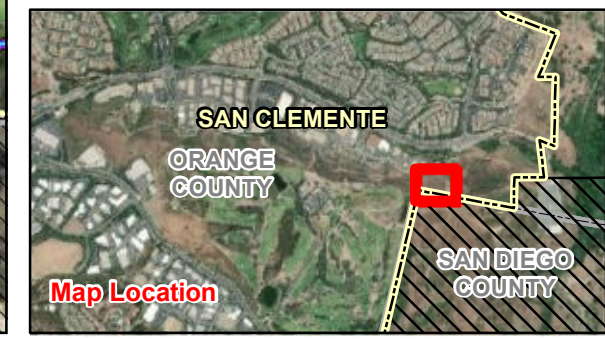
San Clemente
Orange County, CA

LEGEND

- County Boundary
- Municipal Boundary
- Existing SDG&E Easement
- MCB Camp Pendleton
- Jurisdictional Waters**
 - USACOE - Nonwetland Waters
 - CDFW - Streambed
- MPR-13 Components**
 - Stringing Site
- Proposed Project**
 - New Transmission Standard Pole
 - Remove Existing Structure
 - 230 kV Overhead Transmission Line
 - Existing Overhead Transmission Line to be Removed
 - Existing Access Road
 - Work Pad
 - Temporary Work Area



Data Sources: ESRI, Orange Co., SANDAG, SanGIS, SDG&E, USDA.
SPCS NAD83 CA Zone VI Feet.
F:\SOCRE\MPR-13 Loc 42 112420.mxd
SJW 11-30-20



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SAN CLEMENTE

ORANGE COUNTY
SAN DIEGO COUNTY

MCB CAMP PENDLETON

ATTACHMENT C
MPR-13 Site Photographs

MPR-13 Site Photographs



Photo 1: View of proposed MPR-13 stringing site location spanning access roads, facing NW

MPR-13 Site Photographs



Photo 2: View of north end of MPR-13 stringing site location adjacent to access road, facing NW