



Richard Quasarano
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San Diego Gas & Electric Company
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March 30, 2020

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

Re: Minor Project Refinement No. 6 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. 6 (MPR-6) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-6 will authorize the use of additional temporary work area adjacent to the existing work area for new transmission standard pole #09 (Location 09) and existing pole Z327355, previously approved in Notice to Proceed No. 6 (NTP-6). The requested additional work area will total 2,391 square feet, or .05 acre. The requested work area is located entirely within the SDG&E right-of-way (ROW) at Russell Cook Park in San Juan Capistrano and will be used to facilitate the construction of Location 09. Please refer to **Attachment B, MPR-6 Figure** and **Attachment C, MPR-6 Site Photographs** to view the MPR-6 work area.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-6 Figure
Attachment C: MPR-6 Site Photographs

Description of MPR-6 Workspace and Activities

As mentioned above, MPR-6 would authorize SDG&E to use a new temporary work area (totaling 2,391 square feet) adjacent to the approved work area for Location 09 and existing pole Z327355. The additional work area is necessary to safely and efficiently complete the installation of Location 09, although the new work area may also be utilized for removal of Z327355 as well. Due to the presence of groundwater encountered beneath the surface during preliminary borings, the method of installation will require more materials and equipment to be on site at one time than previously anticipated. The activities expected to be performed during the Location 09 pole installation are summarized as follows:

- Drilling equipment will be mobilized to the site, and drilling will take place concurrently

with soil haul-off operations.

- Drilling fluid will be hauled to the site via water trucks and added to the hole until the excavation is at full depth.
- Baker tanks will be delivered and stored on site.
- A corrugated metal pipe (CMP) casing will be inserted into the hole using a crane and grouted with concrete in order to prevent collapse.
- After the CMP is grouted in place, drilling fluid will be pumped out of the hole and into baker tanks until the hole is dry.
- A rebar cage will then be set in the hole using a crane and concrete will be poured inside to create the foundation.
- The transmission standard pole will be installed following foundation installation in accordance with methods described in NTP-6.

The foundation construction method described above is consistent with anticipated variations in final engineering described in Section 2.4.5 of the FEIR.

The MPR-6 work area will be used for temporary laydown of materials and equipment and will provide additional space to be used for drilling, hauling, concrete and crane operations associated with Location 09 construction. The additional work area south of the access road will also allow adequate space for equipment to safely park and maneuver during Location 09 installation activities (See **Attachment B, MPR-6 Figure**). There will be no trees removed within the MPR-6 work area, however vegetation will be cleared within the work area as necessary. No ground-disturbing activities will take place within the MPR-6 work area. The MPR-6 work area will be utilized for approximately 3 months and activities will begin immediately following MPR-6 approval. Following the use of the MPR-6 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 City of San Juan Capistrano.

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-6 work area. Safe pedestrian access to the park will be maintained in accordance with APM PS-1.

MPR-6 Request for Approval

SDG&E respectfully requests approval of MPR-6 to utilize the new temporary work area for installation of Location 09, by April 13, 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-6 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: March 30, 2020

Report No.: 6

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 6 (MPR-6) temporary work area is within SDG&E right-of-way (ROW) on the City San Juan Capistrano's property (Russell Cook Park).

Location/Milepost: The MPR-6 temporary work area is located at Russell Cook Park near new transmission standard pole #09 (Location 09) and existing pole Z327355, in the City of San Juan Capistrano.

Land Use/Vegetative Cover: The 2,391 square-foot MPR-6 work area (0.05-acre) is within disturbed/developed, open oak woodland, and coastal sage scrub (CSS) habitat.

Sensitive Resources: The MPR-6 work area contains 184 square feet of open oak woodland and 169 square feet of low-quality CSS. 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-6 for a new temporary work area required to facilitate construction of Location 09 for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area is adjacent to the existing work area for Location 09 and existing pole Z327355 in Russell Cook Park, previously approved in Notice to Proceed No. 6 (NTP-6). The new MPR-6 work area will total approximately 2,391 square feet (0.05 acre).

The additional MPR-6 work area is necessary to safely and efficiently complete the installation of Location 09, although the new work area may also be utilized for removal of Z327355 as well. Due to the presence of groundwater encountered beneath the surface during preliminary

borings, the method of installation will likely require more materials and equipment to be on site at one time than previously anticipated. The activities expected to be performed during the Location 09 pole installation are summarized as follows:

- Drilling equipment will be mobilized to the site, and drilling will take place concurrently with soil haul-off operations.
- Drilling fluid will be hauled to the site via water trucks and added to the hole until the excavation is at full depth.
- Baker tanks will be delivered and stored on site.
- A corrugated metal pipe (CMP) casing will be inserted into the hole using a crane and grouted with concrete in order to prevent collapse.
- After the CMP is grouted in place, drilling fluid will be pumped out of the hole and into baker tanks until the hole is dry.
- A rebar cage will then be set in the hole using a crane and concrete will be poured inside to create the foundation.
- The transmission standard pole will be installed following foundation installation in accordance with methods described in NTP-6.

The foundation construction method described above is consistent with anticipated variations in final engineering described in Section 2.4.5 of the FEIR.

The MPR-6 work area will be used for temporary laydown of materials and equipment and will provide additional space to be used for drilling, hauling, concrete and crane operations associated with Location 09 construction. The additional work area south of the access road will also allow adequate space for equipment to safely park and maneuver during Location 09 installation activities. There will be no trees removed within the MPR-6 work area, however vegetation will be cleared within the work area as necessary. No ground-disturbing activities will take place within the MPR-6 work area. The MPR-6 work area will be utilized for approximately 3 months and activities will begin immediately following MPR-6 approval. Following the use of the MPR-6 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 City of San Juan Capistrano. **Attachment B, MPR-6 Figure** shows the location of the MPR-6 temporary work area.

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

Original Condition: Because the MPR-6 work area is located immediately adjacent to the NTP-6-approved work area in Russell Cook Park which is in the same approximate location as the work area defined in the Final Environmental Impact Report (FEIR), it is within the geographic study area of the FEIR, and therefore, has been previously analyzed.

Justification for Change: Following final design and constructability review in the field, the construction contractor identified the need to gain access to the MPR-6 work area in order to facilitate the construction of Location 09, as there is not enough room within the previously approved work area in NTP-6 to safely and successfully perform the Location 09 pole installation. The FEIR identified a total of 0.15 acre of work area needed at this location which was changed to 0.08 acre in NTP-6. The addition of the 0.05-acre MPR-6 temporary work area will bring the total work area for Location 9 and Z327355 to 0.13 acre. The additional MPR-6 work area will be used for temporary laydown of materials and equipment and will provide additional space to be used for drilling and crane operations associated with Location 09 construction. The portion of the temporary work area south of the access road will also allow

adequate space for equipment to safely maneuver and park during Location 09 installation activities (See **Attachment B, MPR-6 Figure**). There will be no trees removed within the MPR-6 work area, however vegetation will be cleared within the work area as necessary. No additional access to the MPR-6 work area will need to be constructed.

Maps & Figures: Refer to **Attachment B, MPR-6 Figure**, for a map of the proposed MPR-6 temporary work area location. Refer to **Attachment C, MPR-6 Site Photographs**, for pictures of the current conditions within the MPR-6 temporary work area.

Environmental Impact: Utilization of the MPR-6 temporary work area to facilitate construction of Location 09 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. Safe pedestrian access to the park will be maintained in accordance with APM PS-1 except in case of emergency. Utilization of the MPR-6 work area is anticipated to increase the total temporary impact area for the Project by approximately 0.05 acre. The habitat designations for the MPR-6 temporary work area are as follows: 2,038 square feet of disturbed/developed habitat, 184 square feet of open oak woodland, and 169 square feet of low-quality CSS. Following the use of the MPR-6 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 City of San Juan Capistrano. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed temporary work area for MPR-6 is located immediately adjacent to the previously approved work area and is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	<input type="checkbox"/> No Resources Present	<input checked="" 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. A pre-construction survey was conducted for Location 09 on March 05, 2020 which encompassed the MPR-6 work area. The Project biologist verified that the current condition of the MPR-6 work area was consistent with the results provided in previous biological studies and the Project's Pre-activity survey report (PSR) completed in November 2019. As per Section 4.4 of the FEIR, no special-status plant or wildlife species are present within the MPR-6 work area. Habitat for special-status species is present as described in the above <i>Environmental Impact</i> section. However, much of the MPR-6 work area is highly disturbed, with a high cover of invasive species in the understory, including within the open oak woodland and CSS communities. Please refer to the Biological Resources Assessment that was included in the PEA for additional details regarding the results of previous biological surveys in the MPR-6 area.			
Cultural	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> 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-6 work area) were studied, reviewed, and documented as part of SDG&E's application for a CPCN for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's FEIR, Section 4.5). There are no sensitive cultural resources within the MPR-6 work area.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: In the FEIR, the temporary disturbance for Location 09 was 0.053 acre, and permanent disturbance was 0.096 acre, totaling 0.15 acre. In NTP-6, this was changed to 0.043 acre of temporary disturbance and 0.038 acre of permanent disturbance, totaling .08 acre.

New disturbance acreage: 0.05 acre of temporary disturbance area.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	<input type="checkbox"/> Y	MPR-6 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 increase the severity of any previously identified impacts to geology, soils, and seismicity, and would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary 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-6 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. The drilling fluid that would be used for the Location 9 pole installation does not contain any hazardous materials or toxic substances.
	<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 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

	<input checked="" type="checkbox"/> N	<p>that would be different from the impacts assessed in the Project's FEIR, Section 4.9. Dewatering, if required, would be consistent with dewatering activities described in the FEIR. All MPR-6 activities would be in accordance with the Project's SWPPP. The Applicable APMs and MMs relating to hydrology and water quality that would be applied to NTP-6, would apply to the MPR-6 area, and would be implemented to mitigate for impacts related to hydrology and water quality.</p> <ul style="list-style-type: none"> • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well • MM WQ-1: Pesticide Application
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-6 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-6 work area. There are no ground-disturbing activities proposed within the MPR-6 work area, therefore cultural monitoring is not anticipated to be required. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-6 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-6 work area, therefore paleontological monitoring is not anticipated to be required.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The MPR-6 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-6, that would not already be accounted for in NTP-6. Although a portion of the access road will be restricted during use of the MPR-6 work area, pedestrian access will be maintained to Russell Cook Park in accordance with APM PS-1.</p> <p>No new or significant increase to previously identified significant impacts would occur as a result of the MPR-6 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-6 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	<p>The new temporary work area is not anticipated to require agency consultation relating to traffic and circulation. However, if any traffic control plans are determined to be required, they will be obtained from the City and submitted to the CPUC.</p>
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	<p>The use of the MPR-6 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 proposed as part of this MPR-6 request.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	<p>The new temporary work area would not require agency consultation relating to air quality.</p>
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input checked="" 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. Although the method of pole installation at Location 09 will require more equipment to be on site at one time, and therefore could increase noise, the activities are not anticipated to exceed the severe impact threshold described in the Construction Noise and Vibration Control Plan (CNVCP). All MPR-6 activities will be in compliance with the CNVCP.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	<p>The new temporary work area would not require agency consultation relating to noise and vibration.</p>
	<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-6 work area. The MPR-6 work area would be restored to pre-Project conditions as required upon completion of Project activities. Use of the MPR-</p>

	<input checked="" type="checkbox"/> N	<p>6 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. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-6 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 • MM AES-3: Screen or Effectively Locate Laydown Area • MM AES-5: Shield or Downcast Construction Lighting
Agency Consultation?	<input type="checkbox"/> Y	<p>The new temporary work area 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 MPR-6 work area does not contain any special-status plant or wildlife species consistent with the Project's FEIR Section 4.4. The work area is located within an urbanized park setting, with a high degree of invasive species spread throughout the area including within the open oak woodland and CSS habitat designations. The proposed MPR-6 temporary work area is approximately 2,391 square feet. The habitat designations for the MPR-6 work area are as follows: 2,038 square feet of disturbed/developed habitat, 184 square feet of open oak woodland, and 169 square feet of low-quality CSS. There will be no trees removed within the MPR-6 work area, however other vegetation will be cleared within the work area as necessary.</p>
	<input type="checkbox"/> N	<p>The work area at Location 9 was approximately 6,500 square feet in the FEIR (6,356 square feet of disturbed/developed and 144 square feet of CSS). The work area was shifted due to constructability review in NTP-6, which resulted in a work area of approximately 3,634 square feet (3,475 square feet of disturbed/developed and 159 square feet of low-quality CSS).</p> <p>Although temporary impacts to habitat are anticipated as a result of the use of the MPR-6 work area, with the implementation of avoidance and minimization measures required by the SDG&E Subregional Natural Communities Conservation Plan (NCCP) and the mitigation measures listed below, impacts will remain at a less-than-significant level consistent with those described in Section 4.4.3.3 of the FEIR :</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.

		<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-8: Western Burrowing Owl Impacts 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		Jennifer Kaminsky		<input type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano		<input type="checkbox"/> Reviewed
CPUC Project Manager		Andrew Barnsdale		<input type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input type="checkbox"/> Refinement Approved		<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority

<p>Conditions of Approval or Reason for Denial:</p> <p>Prepared by: Joe Donaldson, E&E, CPUC Compliance Manager</p> <p style="text-align: right;">Date:</p>

ATTACHMENT B
MPR-6 Figure

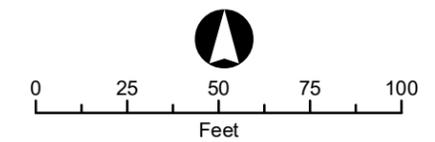
SOCRE PROJECT

**MPR-6 Figure 1
Structure Location 9**

**San Juan Capistrano
Orange County, CA**

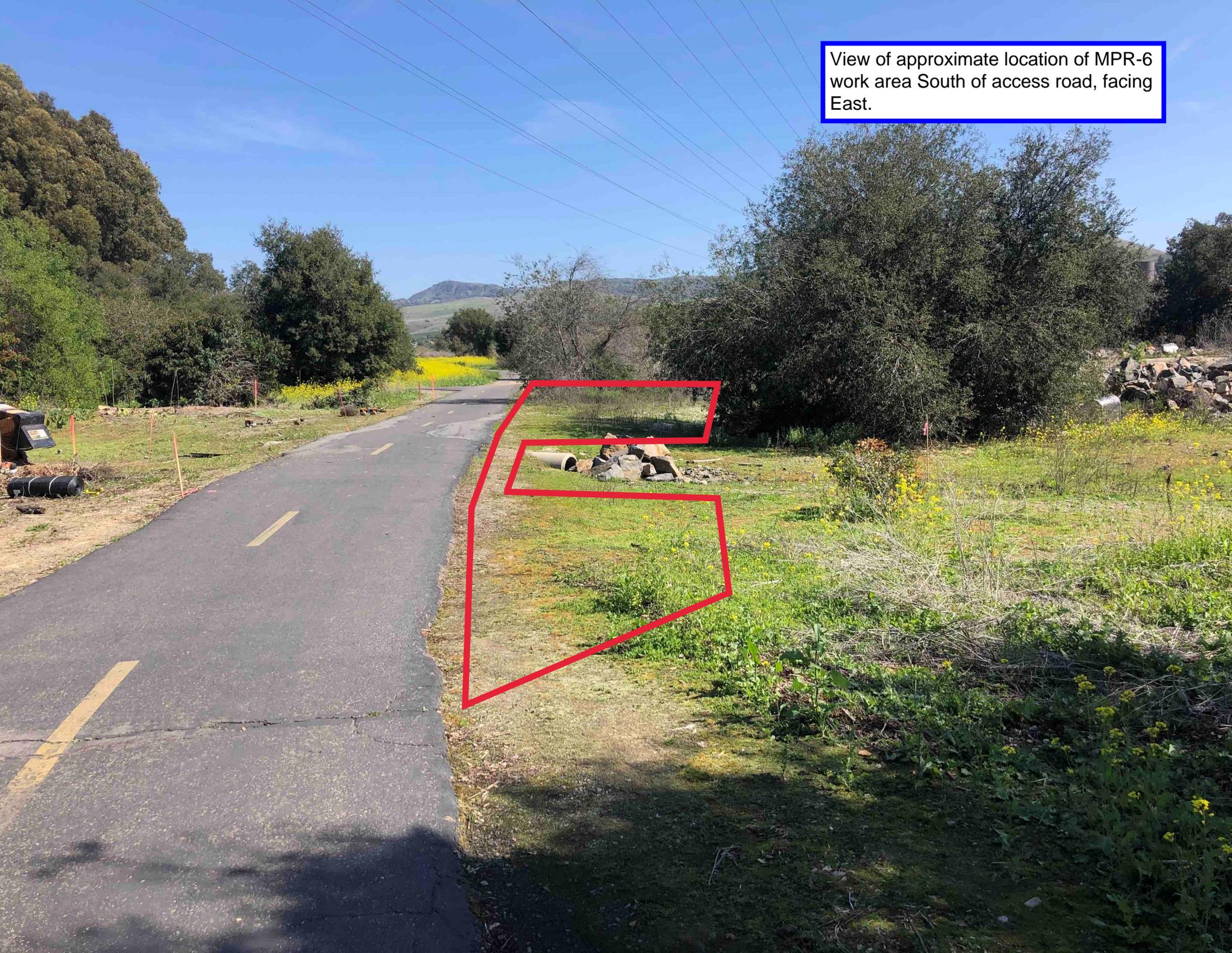
LEGEND

-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
-  USACOE - Jurisdictional Extent
-  CDFW - Jurisdictional Extent
-  Vegetation Covertypes
- MPR-6 Component**
-  Additional Temporary Work Area
- Other Project Components**
-  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 Areas:**
-  Guard Structure
-  Work Area



ATTACHMENT C
MPR-6 Site Photographs

View of approximate location of MPR-6 work area South of access road, facing East.



View of approximate location of MPR-6 work area North of access road, facing Northeast.



View of approximate location of MPR-6 work area North of access road, facing North.

