

Richard Quasarano SOCRE Environmental Project Manager San Diego Gas & Electric Company rquasarano@sdge.com

March 16, 2023

Louis Torres Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Minor Project Refinement No. 17 for the South Orange County Reliability Enhancement Project.

Mr. Torres:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 17 (MPR-17) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-17 will authorize the use of three temporary work areas contiguous with previously approved locations that are located south of Avenida Pico on Marine Corps Base Camp Pendleton (MCBCP). The proposed work areas would be used to facilitate delivery of corrugated metal pipes (CMPs) and to temporarily lay down pipes and associated equipment. The requested additional work areas will be approximately 6,380 square feet, or 0.15 acre. Please refer to **Attachment B, MPR-17 Figure** and **Attachment C, MPR-17 Site Photographs** to view the MPR-17 work areas.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-17 Figure

Attachment C: MPR-17 Site Photographs

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's Notice to Proceed No. 7 (NTP-7) approval letter dated February 4, 2021, 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-7. No permits are required for activities that will be performed within the MPR-17 work area.

MPR-17 Request for Approval

SDG&E respectfully requests approval of MPR-17 to utilize the three new temporary work areas by March 30, 2023. The new temporary work areas will be used in accordance with conditions

SDG&E SOCRE MPR-17

outlined in the CPUC's NTP-7 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: Fernando Guzman, WSP Kevin Kimball, WSP Omar Miranda, SDG&E

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ATTACHMENT A MPR-17 Form

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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 16, 2023			Report No.: 17		
Date Approved: TE	BD		Approval Agency (CPUC).	: California Public	c Utilities Commission
Property Owner(s): The Minor Project Refinement No. 17 (MPR-17) temporary work areas are located within the SDG&E right-of-way (ROW) on Marine Corps Base Camp Pendleton (MCBCP) property. The northern half of AR43 work area is located outside of MCBCP on private property.			Location/Milepost: The MPR-17 temporary work areas are located south of Avenida Pico and west of the Talega Substation in San Diego County.		
 Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-17 work areas is estimated as follows: Stringing Site Additional Work Area (WASS) (west of location 2B work area) – 4,998 sf (0.11 acre) in disturbed. Location 16A Additional Work Area (WA16) (east of Location 16A Work Area) – 1,099 sf (0.03 acre) in disturbed. Access Road Work Area (AR43) (west of Location 43 Work Area) – 283 sf (0.01 acre) in disturbed. 			Sensitive Resource in an area with und There is also poten See resource discu	etermined paleonto	•
Modification From:	☐ Permit ☐ Mitigation	☐ Plan/Pro☑ Other:	cedure	Specification	□ Drawing
	Measure				

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-17 for three new temporary work areas for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work areas are contiguous with previously approved project components as shown in **Attachment B, MPR-17 Figure**. The new MPR-17 work areas will total approximately 6,380 square feet (0.15 acre).

The WASS and WA16 temporary work areas will be utilized for safe temporary laydown of corrugated metal pipes (CMP) for NTP-7 transmission line construction activities. No ground disturbance is anticipated. Cribbing within the WASS and WA16 temporary work areas will be placed to accommodate construction equipment as needed. Trimming (mowing) will be required for disturbed vegetation within the work areas.

The AR43 temporary work area contains a non-functioning fence post that is currently inhibiting the ability to deliver CMPs to the necessary work areas. The fence post will be cut flush with the ground and no ground disturbance is anticipated. AR43 activities will include mowing vegetation for fence post removal and fire mitigation. **Attachment B, MPR-17 Figure** shows the locations of the MPR-17 temporary work areas.

Following the use of the MPR-17 temporary work areas, the sites will be restored and revegetated in compliance with APM AES-2, MM AES-2, the Stormwater Pollution Prevention Plan (SWPPP), and in coordination with the property owners.

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

<u>Original Condition</u>: The MPR-17 work areas were not included in the approved Project. However, the work areas are located within the geographic study area of the Final Environmental Impact Report (FEIR), and therefore have been previously analyzed.

<u>Justification for Change</u>: Following constructability review in the field, the construction contractor identified the need for the additional MPR-17 work areas in order to safely facilitate CMP installation for NTP-7 foundation installation activities. The CMPs range from 6 feet to 12 feet in diameter, and 20 feet to 40 feet in length. The proposed MPR-17 temporary work areas are required to account for the size of the CMPs and to ensure the safe delivery of necessary equipment.

The additional work areas (WASS and WA16) will allow for enough room for safe laydown of CMPs, out of the way from active construction. The CMPs cannot be temporarily laid down within the existing approved work areas due to the substantial size of the CMPs and the uneven terrain of the existing work areas. AR43 is being requested to allow the removal of the non-operational fence post. CMP deliveries would hit the fence post when travelling on the access road if left as-is. The sites requiring CMPs cannot be accessed from other entry points due to limitations within approved access roads. Therefore, MPR-17 is proposing the use of the additional work area and associated land disturbance that was not originally included in NTP-7, but is necessary to construct the Project as described in Section 2.3.3.1 of the Final Environmental Impact Report (FEIR) and the Request for Environmental Impact Report (REIR) approved by the MCBCP.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-17 Figure**, for a map of the proposed MPR-17 temporary work area locations. Refer to **Attachment C, MPR-17 Site Photographs**, for pictures of the current conditions within the MPR-17 temporary work areas.

<u>Environmental Impact</u>: Utilization of the MPR-17 temporary work areas 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. The MPR-17 work areas are approximately 6,380 square feet combined (0.15 acre) and are located within disturbed habitat. Specific discussions for each resource area are provided below.

Each of the proposed work areas are contiguous to Project components that were included in the Amended REIR document. A large portion of the Project's temporary work area included in the REIR (located south of the Location 50, 2B, 15A, and 16A work areas) was reduced by approximately 14,300 square feet (0.32 acre) as final engineering eliminated the need for those temporary poles and associated work areas (see **Attachment B, MPR-17 Figure**). Considering the temporary impacts approved in MPR-15 (0.07 acre) and the temporary impacts proposed for MPR-17 (0.15 acre) results in approximately 0.22 acre of temporary impacts, the overall temporary impact for the NTP-7 work areas is still less than what was proposed in the REIR document. REIR Approval Condition No. 1b states, "The NEPA PM [MCBCP] shall be notified of any significant changes to design, footprint, or Project scope. Certain changes will require additional NEPA [MCBCP] review." The addition of the MPR-17 work areas would not increase the overall Project footprint or involve any new activities or new ground disturbance outside of the approved amended REIR scope. All MPR-17 activities would take place in compliance with the amended REIR approval conditions.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the proposed MPR-17 work areas are located immediately adjacent to the previously approved work areas. All of the MPR-17 requested work areas are within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:							
Biological		No Resources Present		Resources Present		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. The Project biologist verified that the current condition of the MPR-17 work areas were consistent with the results provided in previous biological studies. All work areas are entirely within disturbed habitat dominated by black mustard Brassica nigra), Italian rye grass (Lolium multiflorum), Bermuda buttercup (Oxalis pes-caprae), and bromes (Bromus sp.).							
emporary work areas proposed MPR-17 tem Monitoring, Compliand	WA pora e, a the l	ASS and WA16. ry work areas. In and Reporting Project's Nesting	Veget accor rogran	ation trimming (dance with MM En (MMCRP), a	mowing R-3 in t pre-con	uired within MPR-17 g) will occur within all the Project's Mitigation struction nesting bird P) will be performed to	
Cultural		No Resources Present	\boxtimes	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-17 work areas) 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). Although the MPR-17 work areas are located within an area with undetermined paleontological potential, no ground disturbance is anticipated within the temporary work areas. Therefore, no paleontological monitoring would be required.

There are no cultural sites or Environmentally Sensitive Areas (ESAs) within 100 feet of the proposed MPR-17 work areas, however, isolated cultural finds have been discovered in the vicinity of the MPR-17 work areas. Therefore, cultural monitoring will take place during vegetation trimming and AR43 fence post removal at the recommendation of the Project Archaeologist.

Disturbance Acreage Changes:		Yes	⊠ No
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Although the proposed MPR-17 temporary work areas total 6,380 square feet (0.15 acre), a large portion of the previously approved work area contiguous to the Location 50, 2B, 15A, and 16A work areas is no longer being utilized by the Project (see **Attachment B, MPR-17 Figure**). This southern portion of the work area originally totaled 14,300 square feet (0.32 acre) in temporary impacts. MPR-15 approved 2,925 square feet (0.07 acre) of temporary impacts within the same contiguous work area and MPR-17 is proposing 6,380 square feet of impacts (0.15 acre). Therefore, the overall temporary disturbance acreage would not be increased by the addition of the MPR-17 temporary work areas. The overall temporary disturbance area would still be approximately 4,995 square feet (0.11 acre) less than what was approved in NTP-7 and the Amended REIR document.

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	The activities within the proposed MPR-17 temporary 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. Activities do not involve the installation of any new facilities, performance of any new activities, nor ground disturbance. The fence post that will be removed will be cut at ground level. Accordingly, utilization of the new temporary work areas would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
Agency Consultation?	□ Y ⊠ N	The proposed temporary work areas would not require agency consultation relating to geology, soils, or seismicity.

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.				
Hazardous Materials and Waste	☐ Y ⊠ N	MPR-17 does not involve the installation of any new facilities nor 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?	□ Y ⊠ N	The proposed temporary work areas would not require agency consultation relating to hazards or hazardous materials.				
Hydrology	☐ Y	There are no jurisdictional or non-jurisdictional drainages th would be affected by the use of the MPR-17 work areas. MPI 17 activities would therefore not impede or redirect flood flow alter the existing drainage pattern of the area, or otherwise result in hydrology and water quality that would be differed fro				
	N	the impacts addressed in the Project's FEIR, Section 4.9.				
Agency Consultation?	□ Y☑ N	The new temporary work areas 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-17 temporary work areas. Although review of the Project's previous cultural resources survey reports (prepared for the PEA) determined there were no cultural ESAs within 100 feet of the MPR-17 work areas, there are some isolated				
	□ N	cultural finds that have been recorded in the vicinity. Therefore, cultural monitoring will take place for vegetation trimming and fence post removal within the MPR-17 temporary work areas at the recommendation of the Project Archaeologist. 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-17 work activities:				
		 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 				

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.
		 MM CUL-1: Supplemental Worker Training for Cultural Resources MM CUL-2: Construction Monitoring Plan MM CUL-3: Qualified Cultural Resources Consultants MM CUL-5: Native American Consultation and Participation Planning
		No new significant impacts or a substantial increase in the severity of any previously identified impacts to paleontological resources are anticipated to occur as a result of the proposed new temporary work areas. The MPR-17 work areas are located in an area with undetermined paleontological potential that requires adaptive monitoring for ground disturbing activities per the PMTP. There are no ground disturbing activities proposed within the MPR-17 work areas, therefore paleontological monitoring will not be required. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5.
Agency Consultation?	⊠ Y □ N	Use of the MPR-17 work areas would not require agency or tribal consultation in relation to cultural or paleontological resources. However, if cultural resources are discovered within the MPR-17 work areas (or anywhere on MCBCP), SDG&E will notify MCBCP as required by the REIR.
Traffic and Circulation	□ Y	The MPR-17 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. The fence post located within the AR43 proposed work area is non-operational and would not affect ingress and egress of traffic, except to improve flow and allow for larger trucks and deliveries along the access road. There would be no additional construction crews or change in equipment utilized for MPR-17 that would not already be accounted for in NTP-7. There are no traffic control permits required for the use of the MPR-17 work areas, nor are they located adjacent to any public roads. Accordingly, traffic and circulation impacts resulting from the use of the MPR-17 work areas would be similar to those disclosed in the FEIR, Section 4.15. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-17 work activities:
		APM TR-4: Off Peak Deliveries
		The MPR-17 temporary work areas would not substantially affect traffic and circulation in a manner different from the

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.
		impacts assessed as part of the Project's FEIR, Section 4.15. Additionally, any anticipated access road closures or partial closures will be communicated to the public in advance. Signage is currently placed at worksite entrances notifying the public of possible access restrictions. As always, a spotter and qualified safety personnel will be present to manage any ingress or egress of pedestrians through the access road.
Agency Consultation?	□ Y ⊠ N	The new temporary work areas would not require agency consultation relating to traffic and circulation.
Air Quality	□ Y	The use of the MPR-17 temporary work areas would not result in new significant impacts or a substantial increase in the
	⊠ N	severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities, schedule extensions, or equipment proposed as part of this MPR-17 request.
Agency Consultation?	□ Y	The new temporary work areas would not require agency consultation relating to air quality.
	⊠ N	
Noise and Vibration		The MPR-17 work areas are not in proximity to any sensitive receptors. In addition, MPR-17 does not involve the installation of any new facilities, the performance of any new activities nor
	⊠ N	the use of any new equipment or the performance of any new construction activities. Therefore, utilization of the MPR-17 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.
Agency Consultation?	☐ Y	The new temporary work areas would not require agency consultation relating to noise and vibration.
Aesthetics/ Visual Resources	□ Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-17 work areas. The proposed work areas span across an existing utility access road that does not contain any aesthetic resources. The areas would be revegetated in accordance with the SWPPP and APM AES-2 following construction. The work areas also cannot be readily viewed from any public viewpoints. Therefore, use of the MPR-17 work area would not result in a

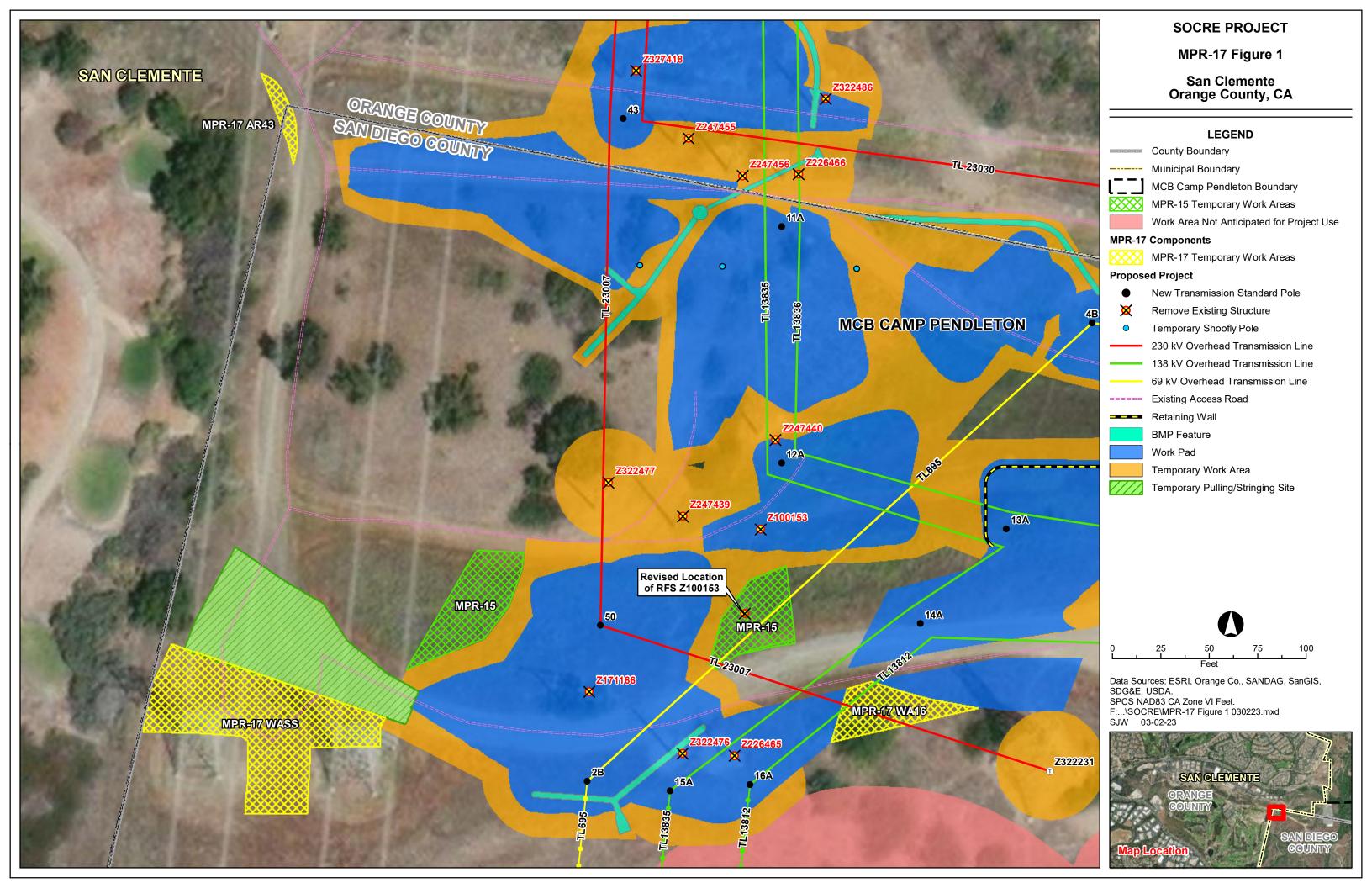
CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.			
	⊠ N	substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's FEIR, Section 4.1. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-17 work activities:			
		 APM AES-1: Clean Work Areas APM AES-2: Restoring Disturbed Areas MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions 			
Agency Consultation?	□ Y⊠ N	The new temporary work areas would not require agency consultation relating to visual resources.			
Vegetation and Wildlife	⊠ Y	The use of the new temporary work areas 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 occur within disturbed habitat dominated by black mustard, Italian rye grass, Bermuda buttercup, and			
	□N	bromes. The proposed work areas do not include any sensitive biological resources as described in the Project's FEIR Section 4.4.			
		Vegetation trimming will take place as needed within the work areas. The vegetation within the work areas has a high concentration of non-native, invasive species and does not contain any sensitive species. Pre-construction nesting bird surveys will be conducted by an Avian Biologist no more than 7 days prior to vegetation trimming activities in each MPR-17 work area during the nesting season (January 1 – September 15) per the NBMP.			
		Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-17 work area, any indirect impacts that may occur to sensitive species in the vicinity of the work areas will be mitigated in accordance with the MMs listed below:			
		 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. 			

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.		
		 MM BR-8: Western Burrowing Owl Impacts Reduction Measures MM BR-9: Invasive Plant Control Measures. 		
Agency Consultation?	⊠ Y □ N	Use of the new temporary work areas would not require agency consultation relating to vegetation and wildlife. However, if there are any special-status species identified within the MPR-17 work areas (or anywhere on MCBCP), SDG&E will notify MCBCP in accordance with requirements in the REIR.		
Wildfire	N Y N	The area in which the MPR-17 staging area is located is within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention and Emergency Response Plan (CFPERP) requirements including but not limited to; • Requirements for equipping diesel and gasoline operated engines with spark arrestors, carrying emergency fire suppression equipment, • Carrying emergency fire suppression equipment, • Furnishing a water truck on or immediately adjacent to the proposed project work area, • Restricting smoking and vehicle idling, • Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and • Conducting pre-activity tailgate meetings that include fire safety discussions.		
		All MPR-17 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. Therefore, the proposed MPR-17 work areas would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts related to fires and wildfires that were analyzed in the FEIR, Section 4.8.		
Agency Consultation?	⊠ Y □ N	SDG&E will coordinate with local emergency response agencies such as fire departments (including MCBCP fire departments) and police during NTP-7 construction, including the use of the MPR-17 work areas. Emergency access will be maintained throughout construction.		

Approvals	Date	Name (print)	Sign	ature				
San Diego Gas and Electric Project Manager		Omar Miranda			Reviewed			
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano			Reviewed			
CPUC Project Manager		Louis Torres			Approved Approved with conditions (see below) Denied			
For CPUC Compliance	Manager Use	Only						
Refinement Appro	ved	☐ Refinement Denied		☐ Beyond A	Authority			
Conditions of Approval or Reason for Denial:								
Prepared by: Fernando Guzman, WSP, CPUC Compliance Manager Date:								

ATTACHMENT B MPR-17 Figure

SDG&E SOCRE MPR-17 4



ATTACHMENT C MPR-17 Site Photographs

SDG&E SOCRE MPR-17 5

SOCRE South Orange County Reliability Enhancement

MPR-17 PHOTO LOG



Photograph 1:

View of the MPR-17 temporary work area WASS. The proposed work area is contiguous with the previously approved stringing site located west of the location 2B work area under Notice to Proceed (NTP-7). Vegetation within the proposed work area consists of black mustard (Brassica nigra), rye ${\it grass}~(Lolium$ multiflorum), Bermuda buttercup (*Oxalis pes-capre*), and brome grass (*Bromus* sp.). Facing: Southeast.



Photograph 2:

View of the MPR-17 temporary work area WASS. Facing: Southwest.



Photograph 3:

View of the MPR-17 temporary work area WA16. The proposed work area is contiguous with the previously approved location 16A work area under NTP-7. Vegetation within the proposed work area consists of rye grass and brome grass. Facing: Southwest.



Photograph 4:

View of the MPR-17 temporary work area WA16. The proposed work area is contiguous with the previously approved location 16A work area under NTP-7. Vegetation within the proposed work area consists of rye grass and brome grass. Facing: Southeast.



Photograph 5:

View of MPR-17 temporary work area AR43 where the nonfunctioning fence post pictured will be cut flush with the ground. The proposed work area is contiguous with the previously approved location 43 work area under NTP-7. Vegetation within the work area consists of black mustard and brome grass. Facing: Northwest.



Photograph 6:

View of MPR-17 temporary work area AR43 where the nonfunctioning fence post pictured will be cut flush with the ground. The proposed work area is contiguous with the previously approved location 43 work area under NTP-7. Vegetation within the work area consists of black mustard and brome grass. Facing: Southwest.



Photograph 7:

View of MPR-17 temporary work area AR43 where the nonfunctioning fence post pictured will be cut flush with the ground. Facing: South.