

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

March 16, 2020

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

Re: Minor Project Refinement No. 5 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. 5 (MPR-5) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-5 will authorize the use of an extended temporary work area around the existing work area for new transmission standard pole #10 (Location 10) and existing pole Z630977, previously approved in Notice to Proceed No. 6 (NTP-6). The requested additional work area will total 22,026 square feet, or .5 acres. The requested temporary work area is located entirely within the SDG&E right-of-way (ROW) at Tar Farms Stables in San Juan Capistrano, and will be used to facilitate the construction of Location 10. Please refer to **Attachment B, MPR-5 Figure** and **Attachment C, MPR-5 Site Photographs** to view the MPR-5 work area.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-5 Figure

Attachment C: MPR-5 Site Photographs

### **Description of MPR-5 Workspace and Activities**

As mentioned above, MPR-5 would authorize SDG&E to use a new temporary work area (totaling 22,026 square-feet) that will surround the approved work area for Location 10 and existing pole Z630977. The additional work area is necessary to safely and efficiently complete the installation of Location 10. Due to the presence of groundwater encountered beneath the surface during preliminary borings, the method of installation will require more equipment to be on site at one time. The activities expected to be performed during the Location 10 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 excavation is at full depth. Baker tanks will be delivered and stored on site. A 65- to 70-foot 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. This method is consistent with anticipated variations in final engineering described in Section 2.4.5 of the FEIR and Section 2.0 of NTP-6.

The MPR-5 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 10 construction. The additional work area will also allow adequate space for equipment to safely park and maneuver during Location 10 installation activities (See **Attachment B, MPR-5 Figure**). There will be no trees or vegetation removed within the MPR-5 work area. The MPR-5 work area will be utilized for approximately 3 months and activities will begin immediately following MPR-5 approval. Following the use of the MPR-5 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 Tar Farms Stables.

#### **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-5 work area. Tar Farms Stables has been notified by SDG&E that this additional work area would be utilized following MPR-5 approval, and they do not have any concerns or objections. Since MPR-5 activities will only occur within the SDG&E ROW, no lease agreement is required with Tar Farms Stables. No horse stables will be altered or removed as part of this MPR, and access to the stables will be maintained throughout construction.

## **MPR-5** Request for Approval

SDG&E respectfully requests approval of MPR-5 to utilize the new temporary work area for installation of Location 10, by March 30, 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 <a href="mailto:rquasarano@sdge.com">rquasarano@sdge.com</a>.

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-5 Form



Data Damusatad, March 16, 2020

## **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: N	narch 16, 2020	кероп но.: 5
Date Approved: TE	BD	<b>Approval Agency:</b> California Public Utilities Commission (CPUC).
5 (MPR-5) tempora	: The Minor Project Refinement I ry work area is within SDG&E rig ar Farms Stables property.	
•	i <b>ve Cover:</b> The 22,026-square fea (0.5-acre) is entirely with habitat.	
Modification From:	☐ Permit ☐ Plan ☐ Mitigation ☐ Othe Measure	/Procedure

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-5 for a new temporary work area required to facilitate construction of Location 10 for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area surrounds the existing work area for Location 10 and existing pole Z630977, previously approved in Notice to Proceed No. 6 (NTP-6) at Tar Farms Stables. The new MPR-5 work area will total approximately 22,026 square feet (0.5 acre).

The additional MPR-5 work area is necessary to safely and efficiently complete the installation of Location 10. Due to the presence of groundwater encountered beneath the surface during preliminary borings, the method of installation will require more equipment to be on site at one

time. The activities expected to be performed during the Location 10 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 excavation is at full depth. Baker tanks will be delivered and stored on site. A 65- to 70-foot 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. This method is consistent with anticipated variations in final engineering described in Section 2.4.5 of the FEIR and Section 2.0 of NTP-6.

The MPR-5 work area will be used for temporary materials and equipment laydown and will provide additional space to be used for drilling, hauling, concrete and crane operations associated with Location 10 construction. The additional work area will also allow adequate space for equipment to safely park and maneuver during Location 10 installation activities. There will be no trees or vegetation removed within the MPR-5 work area. The MPR-5 work area will be utilized for approximately 3 months and activities will begin immediately following MPR-5 approval. Following the use of the MPR-5 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 Tar Farms Stables. **Attachment B, MPR-5 Figure** shows the location of the MPR-5 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 additional temporary work area to complete the pole installation work at Location 10. However, since the MPR-5 work area is located immediately adjacent to the NTP-6-approved work area at Tar Farms Stables, it is within the geographic study area of the FEIR, and therefore, has been previously analyzed.

<u>Justification for Change</u>: Following final design and constructability review in the field, the construction contractor identified the need to gain access to the MPR-5 work area in order to facilitate the construction of Location 10, as there is not enough room within the previously approved work area to safely and successfully perform the Location 10 pole installation. The additional MPR-5 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 10 construction. The additional temporary work area will also allow adequate space for equipment to safely maneuver and turn around during Location 10 installation activities (See **Attachment B, MPR-5 Figure**). There will be no trees or vegetation removed within the MPR-5 work area, and no additional access to the MPR-5 work area will need to be constructed.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-5 Figure,** for a map of the proposed MPR-5 temporary work area location, which includes the direction of the point of view for each picture included in **Attachment C**. Refer to **Attachment C, MPR-5 Site Photographs**, for pictures of the current conditions within the MPR-5 temporary work area.

<u>Environmental Impact</u>: Utilization of the MPR-5 temporary work area to facilitate construction of Location 10 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. Access will be maintained to the horse stables

throughout construction activities except in case of emergency. Utilization of the MPR-5 temporary work area is anticipated to increase the total temporary impact area for the Project by approximately 0.5 acre of disturbed/developed habitat that contains no sensitive resources. Following the use of the MPR-5 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 Tar Farms Stables. Specific discussions for each resource area are provided below.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the new proposed temporary work area for MPR-5 are located immediately adjacent to the previously approved work area, and the new temporary work area is 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	
as part of SDG&E' Project and Proport discussed within the no sensitive biolog survey was conducted from a CDFW/USA (BMPs) for the gual January 15, 2020 if the boundary of the will be sent to CDI	es alor 's appl nent's ne CPU ical res cted fo uitable gist ve results species ACE jur ard str in acco e MPR FW, U e. Plea	ng the Project al ication for a Cert Environmental A IC-conducted CE sources are present Location 10 on habitat for specerified that the sources within the MPR risdictional drainar ucture northwest ordance with MM I-5 work area. Pri SACE, and CPU ase refer to the B	ignmontificated seems with the seems	ent were studied by ent (PEA). Be seview process. A ruary 02, 2020 we atus species was sent condition of biological studied by a rea, the work area, the work area, the work and Juan Creek Location 10 well 1. The same BM the use of the Macoument the coical Resources A	essity (inclogical As per Si work a which eas ident of the Mes. Althor (a). Best of the month of the approximate of the second of the second of the second of the second of the approximate of the approxim	ewed, and documente CPCN) for the SOCR al Resources were als Section 4.4 of the FEIF area. A pre-construction incompassed the MPF affied during the survey MPR-5 work area was ough there is no habita will be less than 50 fee Management Practice foved by the CPUC ould be implemented for work area, a notification in work area within 5 ment that was include	E o R, n R- /. sat et s n or n 0
Guiturai		Resources Present N/A, changes v resources	vould	Present			
work area) were s CPCN for the Pro	ntolog tudied ject ar revie\	ical resources w , reviewed, and nd PEA. These w process (see	ithin to docu resou the	the Project's stu mented as part urces were also Project's FEIR	of SD0	a (including the MPR- G&E's application for ssed within the CPUC on 4.5). There are n	a ;-

Disturbance Acreage Changes:	] Yes	☐ No
.15 acre, and permanent impacts .09 a	cre, totaling	al temporary impacts for Location 10 were g .24 acre. In NTP-6, this was changed to impacts beyond the new pole foundation.
New disturbance acreage: 0.5 acre of t	emporary i	mpact 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	□ Y □ N	MPR-5 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.
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-5 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	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
	□ N	Project's FEIR, Section 4.9. Dewatering, if required, would be consistent with dewatering activities described in the FEIR. The Applicable APMs and MMs relating to hydrology and water quality that would be applied to NTP-6, would apply to the MPR-5 area, and would be implemented to mitigate for impacts related to hydrology and water quality.  • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well
		MM WQ-1: Pesticide Application
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	o new significant impacts or a substantial increase in the everity of any previously identified significant impacts to cultural sources are anticipated to occur as a result of the MPR-5 imporary work area. Review of the Project's previous cultural sources survey reports (prepared for the PEA) confirmed the ck of previously recorded cultural resources in the MPR-5 work ea. Cultural resources and Native American monitors would			
	⊠ N	be onsite for all ground-disturbing activities (e.g., tree root ball removals) in compliance with Project requirements. 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-5 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-5 work area, therefore paleontological monitoring is not anticipated to be required.			
Agency Consultation?	<ul><li>□ Y</li><li>☑ N</li></ul>	The MPR-5 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-5, that would not already be accounted for in NTP-6.			
		No new or significant increase to previously identified significant impacts would occur as a result of the MPR-5 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-5 work activities:			
	⊠ N	APM TR-4: Off Peak Deliveries			
Agency Consultation?	☐ Y	The new temporary work area would not require agency consultation relating to traffic and circulation.			
	⊠ N				

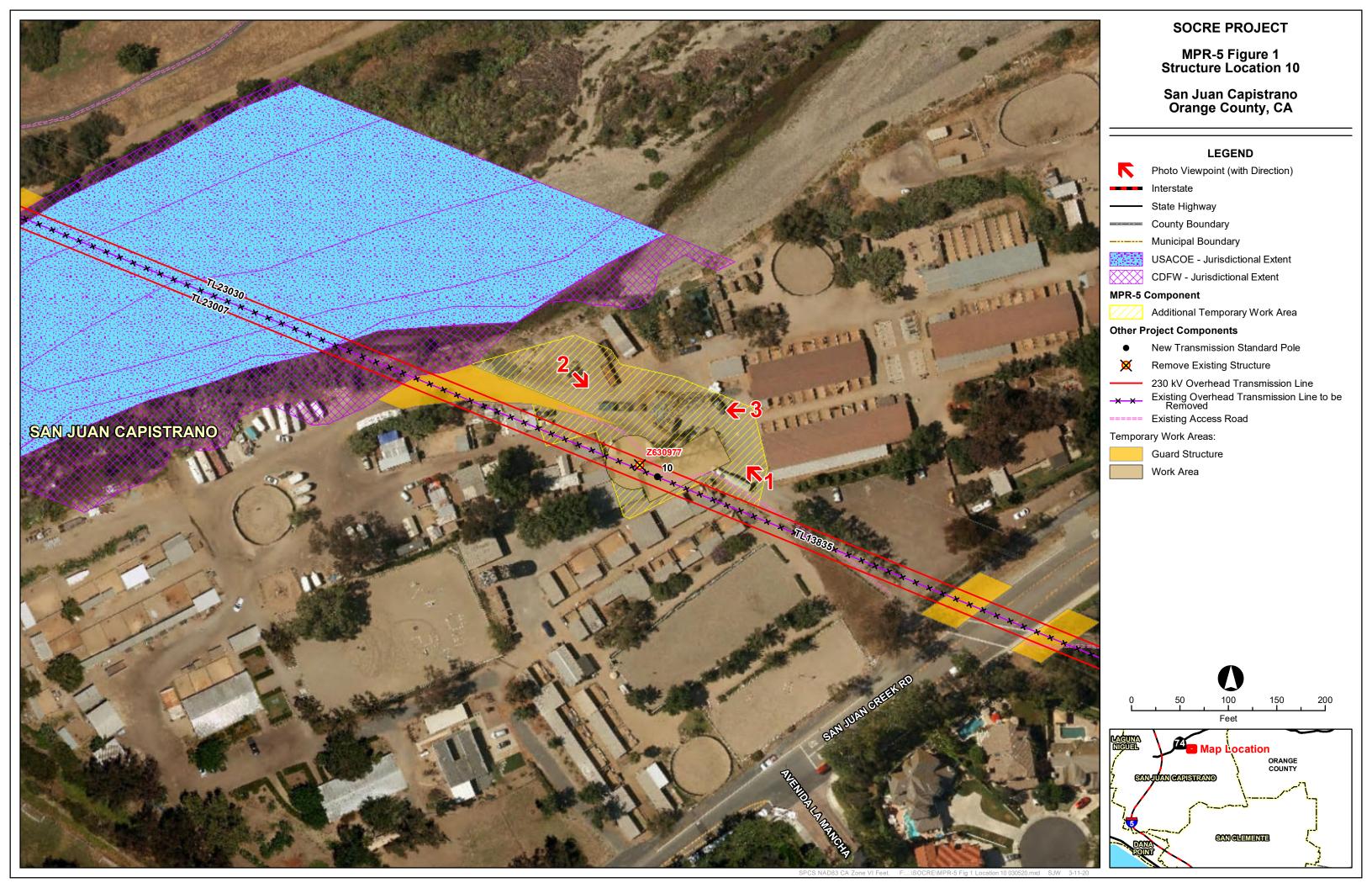
Air Quality	□ Y ⊠ N	The use of the MPR-5 temporary work area would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities proposed as part of this MPR-5 request.			
Agency 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	⊠ 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 noise and vibration that were			
	□N	already analyzed in the Project's FEIR, Section 4.11. Although the method of pole installation at Location 10 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-5 activities will be in compliance with the CNVCP.			
Agency Consultation?	□ Y ⊠ N	The new temporary work area 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-5 work area. The MPR-5 work area would be restored to pre-Project conditions as equired upon completion of Project activities. Use of the MPR-5 work area would not result in a substantial increase in severity			
	⊠ N	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-5 work activities:			
		<ul> <li>APM AES-1: Clean Work Area</li> <li>APM AES-2: Restoring Disturbed Area</li> <li>MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions</li> <li>MM AES-3: Screen or Effectively Locate Laydown Area</li> <li>MM AES-5: Shield or Downcast Construction Lighting</li> </ul>			
Agency Consultation?	<ul><li>□ Y</li><li>⋈ N</li></ul>	The new temporary work area would not require agency 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 (totaling 22,026 square feet) occurs within disturbed/developed habitat and does not include any sensitive biological resources or habitat as described in the Project's FEIR Section 4.4. No trees or vegetation removal is proposed as part of MPR-5 activities.
		Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-5 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:
		MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area.
	⊠ N	MM BR-2: Biological Monitoring.
		<ul><li>MM BR-3: Preconstruction Surveys.</li><li>MM BR-4: Limit Removal of Native Vegetation</li></ul>
		Communities and Trees.
		<ul> <li>MM BR-6: Migratory Birds and Raptors Impact Reduction Measures.</li> </ul>
		MM BR-9: Invasive Plant Control Measures.
Agency Consultation?	□ Y	The new temporary work area would not require agency consultation relating to vegetation and wildlife. However, a
Consultation?	⊠ N	notification will be submitted to CDFW, USACE, and CPUC following prior to the use of the MPR-5 work area to document the change in work area within 50 feet of the San Juan Creek drainage, and to confirm that the previously approved BMPs will
		be installed for the new work area.

Approvals	Date	Name (print)	Signat	ure	
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	ved	☐ Refinement Denied		Beyond A	authority

Conditions of Approval or Reason for Denial:					
Prepared by:	Joe Donaldson, E&E, CPUC Compliance Manager	Date:			

## ATTACHMENT B MPR-5 Figure



# ATTACHMENT C MPR-3 Site Photographs





