

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

October 23, 2020

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

Re: Minor Project Refinement No. 11 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. 11 (MPR-11) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-11 will authorize the use of a new work area along Camino Capistrano and Calle Lorenzo (hereby referred to as Calle Lorenzo work area) and associated fuse cabinet installation work, as well as replacement of an existing 138kV wood transmission standard pole Z225613 with a new 138kV steel transmission standard pole by the same identification number. The Calle Lorenzo work area would also be used to reconfigure overhead conductor between an existing pole (P21482) and the new 12kV distribution cable pole #D1. The new work area is approximately 6,214 square feet, or .14 acre, and is located in San Juan Capistrano, northwest of the Capistrano Substation. Please refer to Attachment B, MPR-11 Figure and Attachment C, MPR-11 Site Photographs to view the MPR-11 work areas and associated components.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-11 Figure

Attachment C: MPR-11 Site Photographs

Description of MPR-11 Workspace and Activities

As mentioned above, MPR-11 would authorize SDG&E to use a new temporary work area and the installation of a fuse cabinet and underground conduit on Calle Lorenzo. In addition, MPR-11 includes the replacement of the existing 138kV wood transmission pole Z225613 with a new 138kV steel transmission pole (no change in identification number) near Avenida de la Vista. The additional Calle Lorenzo work area is necessary to reconfigure conductor between new 12kV distribution cable pole #D1 and existing 12kV distribution pole P21482, and to install the new fuse cabinet and underground conduit east of pole #D1. The location of new distribution cable pole #D1 (approved in Notice to Proceed No. 4 [NTP-4]) shifted slightly northeast during final

engineering, resulting in the need for the overhead alignment to be reconfigured. The new fuse cabinet east of distribution cable pole #D1 was also determined to be necessary during final engineering. The new Calle Lorenzo work area will be used for laydown and access for aerial bucket trucks and other cable installation and vegetation removal equipment. Trenching will take place between distribution cable pole #D1 and the new fuse cabinet in order to install the underground conduit (See **Attachment C, MPR-11 Figure**). Tree trimming will need to be performed prior to the overhead alignment reconfiguration activities along Camino Capistrano for safety reasons but will be minimized to the extent practicable.

During final engineering, it was discovered that existing wood transmission pole Z225613 did not have the strength to support the new transmission line components and would need to be replaced with a steel transmission pole a few feet east of its current location near Avenida de la Vista (See **Attachment C, MPR-11 Figure**).

Note that public roadways adjacent to these pole locations would likely be utilized for traffic control, parking, and workspace for stringing operations as needed and subject to receipt of local municipal traffic control and encroachment permits or authorizations.

The MPR-11 activities are anticipated to take place between the 4th Quarter of 2020 and the 3rd Quarter of 2021. Following completion of MPR-11 activities, the Calle Lorenzo work area will be restored to pre-Project conditions in compliance with APM AES-2, MM AES-2, APM PS-2 and the Project's Storm Water Pollution Prevention Plan (SWPPP) based on pre-Project photo documentation by SDG&E, and in coordination with the property owner and/or the City of San Juan Capistrano.

Preconstruction Requirements and Permit/Approvals

MPR-11 is being requested for approval in accordance with the NTP-4 Approval Letter dated October 29, 2018, specifically Condition of Approval (COA) No. 9. The activities described herein will not change the conditions set forth in the NTP-4 Approval Letter, 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-4. Encroachment Permits and Traffic Control Plans will be obtained as required and submitted to the CPUC prior to the start of permitted activities.

MPR-11 Request for Approval

SDG&E respectfully requests comments or approval of MPR-11 to utilize the new temporary work area identified herein, the installation of a new fuse cabinet on the corner of Calle Lorenzo and Camino Capistrano, and for the pole replacement work near Avenida de la Vista by November 6, 2020. 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-11 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: (October 23, 2020	Report No.: 11			
Date Approved: The	BD	Approval Agency: California Public Utilities Commission (CPUC).			
provides the right to): SDG&E has an easement which o perform the activities described in ement No. 11 (MPR-11) and to utilize work area.	Location/Milepost: The MPR-11 new temporary work area and associated fuse cabinet and underground conduit is located on Camino Capistrano and Calle Lorenzo, northwest of the future San Juan Capistrano Substation, in the City of San Juan Capistrano. The pole replacement location (Z225613) is located near Avenida de la Vista, west of the future San Juan Capistrano Substation, in the City of San Juan Capistrano.			
Calle Lorenzo is ap acre) and is entire	ve Cover: The MPR-11 work area on proximately 6,214 square feet (0.14-ly within developed land. The pole on near Avenida de la Vista is also nd.	Sensitive Resources: There are no sensitive resources in the MPR-11 new temporary work area, nor would any sensitive resources be impacted by the pole replacement activities within the existing work area near Avenida de la Vista. See resource discussions below.			
Modification From:	☐ Permit☐ Plan/Prod☐ Mitigation Measure☐ Other:	cedure Specification Drawing			

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-11 for the use of a new temporary work area on Camino Capistrano and Calle Lorenzo (hereby referred to as Calle Lorenzo work area) and associated fuse cabinet and underground conduit installation work. MPR-11 would also include the replacement of an existing 138kV wood transmission standard pole Z225613 with a new 138kV steel transmission standard pole by the same identification number for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary MPR-11 work area is approximately 6,214 square feet (0.14 acre).

The additional Calle Lorenzo work area is necessary to reconfigure conductor between new 12kV distribution cable pole #D1 and existing 12kV distribution pole P21482, and to install the new fuse cabinet and underground conduit east of pole #D1. The location of new distribution cable pole #D1 (approved in Notice to Proceed No. 4 [NTP-4]) shifted slightly northeast during final engineering, resulting in the need for the overhead alignment to be reconfigured. The new fuse cabinet east of distribution cable pole #D1 was also determined to be necessary during final engineering. The new Calle Lorenzo work area will be used for laydown and access for aerial bucket trucks and other cable installation and vegetation removal equipment. Trenching will take place between distribution cable pole #D1 and the new fuse cabinet in order to install the underground conduit. Tree trimming will need to be performed prior to the overhead alignment reconfiguration activities along Camino Capistrano for safety reasons but will be minimized to the extent practicable.

During final engineering, it was discovered that existing wood transmission pole Z225613 did not have the strength to support the new transmission line components and would need to be replaced with a steel transmission pole a few feet east of its current location near Avenida de la Vista.

The MPR-11 activities are anticipated to take place between the 4th Quarter of 2020 and the 3rd Quarter of 2021. Following completion of MPR-11 activities, the Calle Lorenzo work area will be restored to pre-Project conditions in compliance with APM AES-2, MM AES-2, APM PS-2 and the Project's Storm Water Pollution Prevention Plan (SWPPP) based on pre-Project photo documentation by SDG&E, and in coordination with the property owner and/or the City of San Juan Capistrano. **Attachment B, MPR-11 Figure** shows the location of the MPR-11 components and Cale Lorenzo 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 the MPR-11 activities or the Calle Lorenzo Work Area. However, since the MPR-11 components are located wither within or immediately adjacent to the NTP-4 work area, they are within the geographic study area of the FEIR, and therefore, have been previously analyzed.

<u>Justification for Change</u>: Following final engineering, the fuse cabinet and underground conduit installation and overhead reconfiguration work between distribution pole #D1 and P21482 on Calle Lorenzo and Camino Capistrano were determined to be necessary. The Calle Lorenzo work area will be required to facilitate these activities. In addition, it was discovered that existing wood transmission pole Z225613 did not have the strength to support the new transmission line components and would need to be replaced with a new steel transmission pole near Avenida de la Vista.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-11 Figure**, for a map of the proposed MPR-11 components and Calle Lorenzo work area. Refer to **Attachment C, MPR-11 Site Photographs**, for pictures of the current conditions within the MPR-11 work area.

Environmental Impact: MPR-11 activities 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 regulatory approval. Encroachment and traffic control plans will be obtained as necessary. MPR-11 activities including utilization of the Calle Lorenzo work area is anticipated to increase the total temporary impact area for the Project by approximately 0.15 acre and permanent impact area by approximately 11 square feet of developed land that contains no sensitive resources. Following completion of MPR-11 activities, the Calle Lorenzo work area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with the property owner and/or City of San Juan Capistrano. Specific discussions for each resource area are provided below.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the MPR-11 components are located either immediately adjacent or within the previously approved NTP-4 work area, and are within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:							
Biological	\boxtimes	No Resources	_	Resources		N/A, Change would	
		Present		Present		not affect resources	
Previous Biological	Sur	vey Report Refere	enc	e:			
•				-		wed, and documented	
						CPCN) for the SOCRE	
						I Resources were also	
				-		tent with Section 4.4 of	
		•		•		orenzo work area or at	
•				•		onstruction survey was	
		•				special-status species	
•		-		•		ne current condition of	
				•		in previous biological	
	surveys. The work areas are entirely within developed land with no sensitive resources.						
Cultural	\boxtimes	No _		Resources			
		Resources	'	Present			
	Present						
□ N/A, changes would not affect □ N/A is a second or							
		resources					
Previous Cultural Survey Report Reference:							
Cultural and paleontological resources within the Project's study area (including the MPR-11							

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). There are no known sensitive cultural resources within the Calle Lorenzo work area or at the location of the pole

replacement near Avenida de la Vista.

<u>Disturbance Acreage Changes:</u> ⊠ Yes □ No
Original disturbance acreage: None, MPR-11 activities were not anticipated to be required for Project construction.
New disturbance acreage: 0.14 acre of temporary disturbance. Approximately 7 square feet of permanent disturbance would result from the installation of new pole Z225613, and approximately 4 square feet would result in the installation of the fuse cabinet in the Calle Lorenzo work 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	⊠ Y	The trenching and fuse box installation activities that would take place within the Calle Lorenzo work area would not result in a
Seismicity	□N	new significant impact or a substantial increase in the severity of any previously identified significant impacts to geology, soils, or seismicity. Nor would the wood transmission pole removal activities (Z225613), or the direct-bury installation of the new steel transmission pole create any new impacts to geology, soils, or seismicity. MPR-11 activities would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
Agency Consultation?	☐ Y	MPR-11 activities would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	∑ Y	As described in Section 4.8.3.3 of the FEIR, once the wood transmission pole Z225613 is removed, it will be recycled if possible or otherwise disposed of at a facility appropriately licensed to receive this type of waste. MPR-11 activities would not require any new potentially hazardous materials to be used, would not create any new type of 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 Applicable APMs and MMs that would be applied to NTP-4, would apply to MPR-11, and would be implemented to mitigate for impacts related to hazardous materials. • APM HAZ-3: Personal Protection Equipment • APM HAZ-5: Recycling and Reuse • APM HAZ-6: Fire Control • MM HAZ-3: Worker Safety Training • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well
	□ N	
	Y	

Agency Consultation?	⊠ N	MPR-11 activities would not require agency consultation relating to hazards or hazardous materials.					
Hydrology	□ Y□ N	MPR-11 activities 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.					
	Ø N	The Applicable APMs and MMs relating to hydrology and w quality that would be applied to NTP-4, would apply to MPR and would be implemented to mitigate for impacts relate hydrology and water quality.					
		MM WQ-1: Pesticide Application					
Agency Consultation?	□ Y⊠ N	MPR-11 activities 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 MPR-11 activities. 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-11 work areas. Although ground-disturbing activities will take place within					
	⊠ N	the Calle Lorenzo work area (trenching and fuse box installation), cultural monitoring will not be required during these activities as they will not occur within native soils per Section 6.0 of the Cultural Resources Construction Monitoring Plan.					
		The MPR-11 activities on Avenida de la Vista are not within 100 feet of a cultural Environmentally Sensitive Area, therefore cultural monitoring is not anticipated to be required. MPR-11 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-11 work activities:					
		 APM CUL-1: Worker Training for Cultural Resources APM CUL-4: Unanticipated Cultural Finds APM CUL-5: Curate Cultural Discoveries MM CUL-1: Supplemental Worker Training for Cultural Resources 					
		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 MPR-11 activities. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5. Paleontological monitoring will take place during MPR-11 ground-disturbing activities at the discretion of the Qualified Paleontological					

Agonov		Consultant, as the work areas are located in a young alluvial flood plain deposit with low or undetermined potential. No new or altered APMs or MMs would be required, and the following APMs would be implemented for MPR-11 work activities: • APM CUL-8: Paleontological Monitoring • APM CUL-9: Discovery of Fossils MPR-11 activities would not require agency or tribal
Agency Consultation?	 Y N	consultation in relation to cultural or paleontological resources.
Traffic and Circulation	⊠ Y	Impacts to both Camino Capistrano and Avenida de la Vista were analyzed in the FEIR. MPR-11 construction activities 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. Although new facilities would be installed in the form of a fuse box and conduit in the Calle Lorenzo work area and a steel transmission pole (Z225613) on Avenida de la Vista, this would not require additional construction crews or change in equipment utilized, that would not already be accounted for.
	□ N	Public roadways adjacent to MPR-11 components will likely be utilized for traffic control, parking and workspace for stringing operations as needed and subject to receipt of local municipal traffic control and encroachment permits or authorizations. Emergency access will be maintained to nearby communities during all traffic control activities in accordance with APM TR-3. It should also be noted the existing wood transmission pole Z225613 is currently located directly in the sidewalk and will be relocated so that it no longer obstructs the sidewalk and impedes pedestrian traffic (See Attachment C: MPR-11 Site Photographs).
		No new or significant increase to previously identified significant impacts would occur as a result of the MPR-11 activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-11 work activities:
		 APM TR-1: Avoid Traffic Near Schools APM TR-2: Avoid SR-74 Traffic APM TR-3: Emergency Access APM TR-4: Off Peak Deliveries APM TR-5: Material Removal, City Streets APM TR-7: Traffic Control Plans MM TR-4: City of San Juan Capistrano and City of San Clemente Traffic Engineer and Parks and Recreation Review

		MM TR-5: Content Requirements of the Traffic Control Plan					
Agency Consultation?	⊠ Y	Traffic control will be required within public streets to perform MPR-11 activities. Encroachment permits / traffic control plants.					
	□N	will be obtained from the City of San Juan Capistrano prior to activities that will require traffic control and will be submitted to the CPUC for their records.					
Air Quality	□ Y	MPR-11 activities would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and					
	⊠ N	disclosed within the Project's FEIR, Section 4.3, as there is no new equipment or significant increase in activity proposed as part of this MPR-11 request. Equipment use will be tracked daily and analyzed as part of the Monthly NOx Emissions Memorandum.					
Agency Consultation?	□ Y	MPR-11 activities would not require agency consultation relating to air quality.					
	⊠ N	, ,					
Noise and Vibration	□ Y	MPR-11 activities 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 is no new equipment or					
	⊠ N	significant increase in activity proposed as part of this MPR-11 request. It should also be noted, the new steel pole Z225613 will have a direct-bury foundation which is not anticipated to generate new significant noise or disturbance, especially considering the jack and bore operation and other activities which have been active in the nearby Westport Community. No weekend or nighttime work is anticipated to occur as part of MPR-11 activities.					
		No new or altered APMs or MMs would be required, and the following MM would be implemented for MPR-11 work activities: • MM NV-3: Construction Vibration Control Measures					
Agency Consultation?	□ Y	MPR-11 activities would not require agency consultation relating to noise and vibration.					
33.13414111	⊠ N						

Aesthetics/ Visual Resources	N N	Although the location of distribution cable pole #D1 has shifted slightly, the pole was contemplated as part of the Project in approximately the same location and was therefore previously analyzed in the FEIR. There will also be a new fuse cabinet installed within the MPR-11 work area, however it will be located near another existing fuse cabinet and other utility infrastructure components and will not be easily viewed from Camino Capistrano. There is one ornamental shrub (Acacia cyclops) that may need to be removed in the Calle Lorenzo work area (Attachment C: MPR-11 Site Photographs). Although Camino Capistrano is a designated scenic corridor, these minor changes will not create a new significant impact to visual resources or create an increase in severity to previously identified impacts with implementation of the below APMs and MMs. The transmission pole replacement work on Avenida de la Vista would also not result in a new significant visual impact as there would be minimal increase in visual contrast because there are already existing utility infrastructure elements in this location, including the existing wood pole to be replaced and the adjacent steel transmission cable pole (Z122016). The new steel transmission pole Z225613 will be 79 feet tall, which is approximately 12 feet taller than the existing wood transmission pole. The increase in height is due to a change in the conductor configuration to better match the existing and new configurations. The relocation of the pole will also move it out of
		the sidewalk. The neighborhood near the pole replacement location was not identified as an area with high viewer sensitivity in the FEIR. For these reasons, MPR-11 activities 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. The Calle Lorenzo work area would be restored to pre-Project conditions as required upon completion of Project activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-11
		 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 MM AES-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors
Agency Consultation?	□ Y⊠ N	MPR-11 activities would not require agency consultation relating to aesthetics or visual resources.

Vegetation and Wildlife	⊠ Y	MPR-11 activities would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The Calle Lorenzo work area (totaling 6,214 square feet) and the pole replacement location (Z225613) occur within developed land and do not include any			
	□N	sensitive biological resources. Tree trimming of ornamental trees will be required in order to safely perform the overhead wire reconfiguration work between distribution poles P21482 and #D1. No tree removal is proposed as part of MPR-11 activities. Removal of ground-level vegetation is also not proposed as part of MPR-11 activities, with the exception of the displacement of the landscaped grass where the new steel transmission pole Z225613 will be installed and the potential removal of the coastal wattle (Acacia cyclops) shrub within the Calle Lorenzo work area (See Attachment C: MPR-11 Site Photographs). The coastal wattle shrub is ornamental, non-native and has no conservation status.			
		Although no impacts to sensitive biological resources are anticipated to occur during MPR-11 activities, 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-2: Biological Monitoring MM BR-3: Preconstruction Surveys MM BR-4: Limit Removal of Native Vegetation Communities and Trees MM BR-5: Avian Safe Building Standards MM BR-6: Migratory Birds and Raptors Impact Reduction Measures 			
Agency Consultation?	□ Y ⊠ N	MPR-11 activities would not require agency consultation relating to vegetation and wildlife.			

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

ATTACHMENT B MPR-11 Figure



ATTACHMENT C MPR-11 Site Photographs







