

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

December 16, 2022

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

Re: Minor Project Refinement No. 15 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. 15 (MPR-15) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-15 will authorize the use of two new temporary work areas contiguous with the approved Location 50 work area, on its east and west sides. The requested additional work areas will total approximately 2,925 square feet, or 0.07 acre. Please refer to **Attachment B, MPR-15 Figure** and **Attachment C, MPR-15 Site Photographs** to view the MPR-15 work areas.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-15 Figure

Attachment C: MPR-15 Site Photographs

### **Preconstruction Requirements and Permit/Approvals**

Approval of MPR-15 will not change the conditions set forth in the CPUC's Notice to Proceed No. 7 (NTP-7) approval letter dated February 04, 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. The approval of MPR-15 will also not change the conditions set forth in the Amended Request for Environmental Impact Report (REIR) approval issued by Marine Corps Base Camp Pendleton (MCBCP) on September 7, 2022. No additional permits are anticipated to be required for MPR-15 activities.

#### **MPR-15 Request for Approval**

SDG&E respectfully requests approval of MPR-15 to utilize the new temporary work areas near Location 50, by January 13, 2023. 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: Kevin Kimball, Ecology and Environment, Inc.

Omar Miranda, SDG&E

Kenda Pollio, KP Environmental

# ATTACHMENT A MPR-15 Form



# South Orange County Reliability Enhancement Project CPUC Minor Project Refinement Form

**Minor project refinements** are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact based on criteria used in the FEIR, create a new significant impact, are located within the geographic boundary of the study area of the FEIR, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: December 16, 2022			Report No.: 15		
Date Approved: TBD			<b>Approval Agency:</b> California Public Utilities Commission (CPUC).		
<b>Property Owner(s):</b> The Minor Project Refinement No. 15 (MPR-15) temporary work areas are located entirely within the SDG&E right-of-way (ROW) on Marine Corps Base Camp Pendleton (MCBCP) property.			<b>Location/Milepost:</b> The MPR-15 temporary work areas are contiguous with the Location 50 work area south of Avenida Pico in San Diego County.		
<ul> <li>Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-15 work areas is estimated as follows:</li> <li>Location 50 Additional Work Area (western work area) – 1,600 sf (0.04 acre) in disturbed.</li> <li>Location Z100153 Additional Work Area (eastern work area) – 1,325 sf (0.03 acre) in disturbed.</li> </ul>		work areas is  Area (western in disturbed.  Work Area	Sensitive Resources: The MPR-15 work areas are located in an area with undetermined paleontological potential. There is also potential for cultural resources in the area. See resource discussions below.		
Modification From:	<ul><li>☐ Permit</li><li>☐ Mitigation</li><li>Measure</li></ul>	☐ Plan/Prod ☐ Other:	cedure Specification Drawing		

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-15 for two new temporary work areas for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work areas are contiguous with the approved Location 50 work area, on its east and west sides. Location 50 was previously approved in Notice to Proceed No. 7 (NTP-7). The MPR-15 work areas will total approximately 2,925 square feet (0.07 acre).

The western MPR-15 temporary work area is being included as part of the corrective action for the compliance incident that took place on November 29, 2022. The area was mowed outside of the approved work limits during vegetation trimming activities at Location 50. The Project does not currently anticipate the use of this western area, but the additional temporary impact is being recorded in MPR-15 for the Project record.

The eastern MPR-15 temporary work area is required in order to access the remove-from-service (RFS) pole Z100153. Existing RFS pole Z100153 was moved approximately 50 feet south in a non-Project related action and now falls outside of the approved Project work areas (See **Attachment B, MPR-15 Figure**). The pole will be accessed from the east via the existing access road. The pole will be dismantled by crane and hauled away by a flatbed truck as described in Section 2.4.5.4 of the FEIR. The concrete foundation will be jackhammered and removed with an excavator. There is no ground disturbance anticipated to be required within the MPR-15 work areas with the exception of the Z100153 pole removal activities.

Following the use of the MPR-15 temporary work areas, the sites will be stabilized in accordance with the Stormwater Pollution Prevention Plan (SWPPP).

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

<u>Original Condition</u>: The MPR-15 work areas were not included in the approved Project. However; the MPR-15 work areas are located within the geographic study area of the Final Environmental Impact Report (FEIR), and therefore have been previously analyzed. Since the Project was originally designed, the position of RFS pole Z100153 has moved (non-Project related). This has resulted in the need for the eastern MPR-15 work area for the reasons described below.

#### Justification for Change:

The construction contractor identified the need to utilize the eastern MPR-15 work area in order to access the RFS pole Z100153. RFS pole Z100153 is currently located approximately 50 feet south of its original mapped location within the 12A work area due to non-Project related action. It now falls outside of the approved Project work areas (See **Attachment B, MPR-15 Figure**). The pole will be accessed from the east via the existing access road. The pole cannot be accessed from the west (existing Location 50 work area) due to the slope and existing transmission structure down guy wires. As stated above, the western MPR-15 work area is not anticipated to be utilized by the Project, but is being included as part of the corrective action for the compliance incident on November 29, where the area was mowed.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-15 Figure**, for a map of the proposed MPR-15 temporary work area locations. Refer to **Attachment C, MPR-15 Site Photographs**, for pictures of the current conditions within the MPR-15 temporary work areas.

<u>Environmental Impact</u>: Utilization of the MPR-15 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-15 work areas are approximately 2,925 square feet combined (0.07 acre) and are located within disturbed habitat.

The MPR-15 work areas are located within an area with undetermined paleontological potential requiring adaptive paleontological monitoring per the Paleontological Monitoring and Treatment Plan (PMTP). Although the MPR-15 work areas are not located within 100 feet of a cultural

environmentally sensitive area (ESA), there is potential for cultural resources in the vicinity of the MPR-15 work areas and monitoring will take place during ground disturbing activities, or at the recommendation of the Project Archaeologist. Specific discussions for each resource area are provided below.

The removal of the RFS pole Z100153 was included in the scope of the amended Request for Environmental Impact Report (REIR) approved by MCBCP on September 7, 2022. The Project impact area has been reduced by approximately 14,300 square feet (0.32 acre) of temporary impacts as the temporary poles and associated work areas south of Locations 15A and 16A will no longer be utilized by the Project (see **Attachment B, MPR-15 Figure**). 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-15 work areas would not increase the overall Project footprint or involve any activities outside of the approved amended REIR scope. All MPR-15 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-15 work areas are located immediately adjacent to the previously approved work area for Location 50 and 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. Consistent with Section 4.4 of the FEIR, no sensitive biological resources are present within the MPR-15 work areas. A biological pre-construction survey was conducted for the MPR-15 work area on November 23, 2022. No suitable habitat for special-status species was identified during the survey. The Project biologist verified that the current condition of the MPR-15 work areas was consistent with the results provided in previous biological studies. Both work areas are entirely within disturbed habitat dominated by black mustard ( <i>Brassica nigra</i> ) and bromes ( <i>Bromus sp.</i> ).							
Cultural		No Resources Present		Resources Present		N/A, Change would not affect resources	
Previous Cultural Survey Report Reference: Cultural and paleontological resources within the Project's study area (including the MPR-15 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) as well as the MCBCP REIR review process.							

Although there are no cultural sites or ESAs within 100 feet of the proposed MPR-15 work areas, isolated cultural finds have been discovered in the vicinity of the MPR-15 work areas. Therefore, cultural monitoring will take place during ground disturbing activities, or at the recommendation of

the Project Archaeologist.

Consistent with Section 4.5 of the FEIR and the PMTP, the MPR-15 work areas are located in an area with undetermined paleontological potential that requires adaptive monitoring for ground disturbing activities. Paleontological monitoring would therefore take place for the pole removal activities (RFS pole Z100153) in the eastern MPR-15 work area. There are no other ground disturbing activities anticipated within the MPR-15 work areas.
<u>Disturbance Acreage Changes:</u> ☐ Yes ☐ No
Although the proposed MPR-15 temporary work areas total 2,925 square feet (0.07 acre), a large portion of the work area contiguous to the Location 50, 2B, 15A, and 16A work area is no longer being utilized by the Project (see <b>Attachment B, MPR-15 Figure</b> ). This southern portion of work area is 14,300 square feet (0.32 acre), therefore the overall temporary disturbance acreage would not be increased by the addition of the MPR-15 work areas.

CEQA	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA			
Section	Applicable	section isn't applicable. If (Y), describe original and new level of			
000000		impact, and avoidance/minimization measures to be taken.			
Geology,	ПΥ	Although MPR-15 would involve ground disturbance to remove			
Soils, and		existing pole Z100153, this activity would take place in approximately			
Seismicity	⊠ N	the same area as approved in the FEIR. RFS pole Z100153 is			
		currently located approximately 50 feet south of its original location			
		which was moved in a non-Project related action (see <b>Attachment B, MPR-15 Figure</b> ). Vegetation trimming will occur as needed within			
		the MPR-15 temporary work areas. Erosion control BMPs will be			
		installed in accordance with the SWPPP. 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	The proposed temporary work areas would not require agend consultation relating to geology, soils, or seismicity.			
Consultation?	⊠ N	consultation relating to geology, soils, or seismicity.			
Hazardous	□ Y	MPR-15 does not involve the installation of any new facilities of			
Materials and Waste	⊠ N	performance of any new activities. Accordingly, utilization of the new temporary work areas 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			
Agency		disclosed in the Project's FEIR, Section 4.8.  The proposed temporary work areas would not require agency			
Consultation?	☐ Y	consultation relating to hazards or hazardous materials.			
	⊠ N				
Hydrology		There are no jurisdictional or non-jurisdictional drainages that would			
and Water		be affected by the use of the MPR-15 work areas. MPR-15 activities			
Quality		would therefore not impede or redirect flood flow, alter the existing drainage pattern of the area, or otherwise result in impacts to			
		hydrology and water quality that would be different from the impacts			
	⊠ N	assessed in the Project's FEIR, Section 4.9.			

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.			
Agency Consultation?	□ Y	The new temporary work areas would not require agency consultation relating to hydrology or water quality.			
	⊠N	9 , 9, 1			
Cultural Resources	⊠ Y	No new significant impacts or a substantial increase in the severity of any previously identified impacts to cultural resources are anticipated to occur as a result of the MPR-15 temporary work areas. Although review of the Project's previous cultural resources survey reports (prepared for the PEA) determined there were no archaeological sites or cultural ESAs within 100 feet of the MPR-15 work areas, there are some isolated cultural finds that have been recorded in the vicinity.			
	□N	Therefore, cultural monitoring will take place for ground disturbing activities (Z100153 pole removal) within the eastern MPR-15 work area. 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-15 work activities:			
		<ul> <li>APM CUL-1: Worker Training for Cultural Resources</li> <li>APM CUL-2: Cultural Resource Monitoring</li> <li>APM CUL-3: Avoid Known Cultural Resources</li> <li>APM CUL-4: Unanticipated Cultural Finds</li> <li>APM CUL-5: Curate Cultural Discoveries</li> <li>APM CUL-6: Archaeological Monitoring Results Report</li> <li>APM CUL-7: Monitoring by Native Americans</li> <li>MM CUL-1: Supplemental Worker Training for Cultural Resources</li> <li>MM CUL-2: Construction Monitoring Plan</li> <li>MM CUL-3: Qualified Cultural Resources Consultants</li> <li>MM CUL-5: Native American Consultation and Participation Planning</li> </ul>			
		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-15 work areas are located in an area with undetermined paleontological potential that requires adaptive monitoring for ground disturbing activities per the PMTP. Paleontological monitoring would therefore take place for the pole removal activities (RFS pole Z100153) in the eastern MPR-15 work area. There are no other ground disturbing activities anticipated within the MPR-15 work areas. No impacts to paleontological resources are anticipated beyond what was 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-15 work activities:			
		APM CUL-8: Paleontological Monitoring			

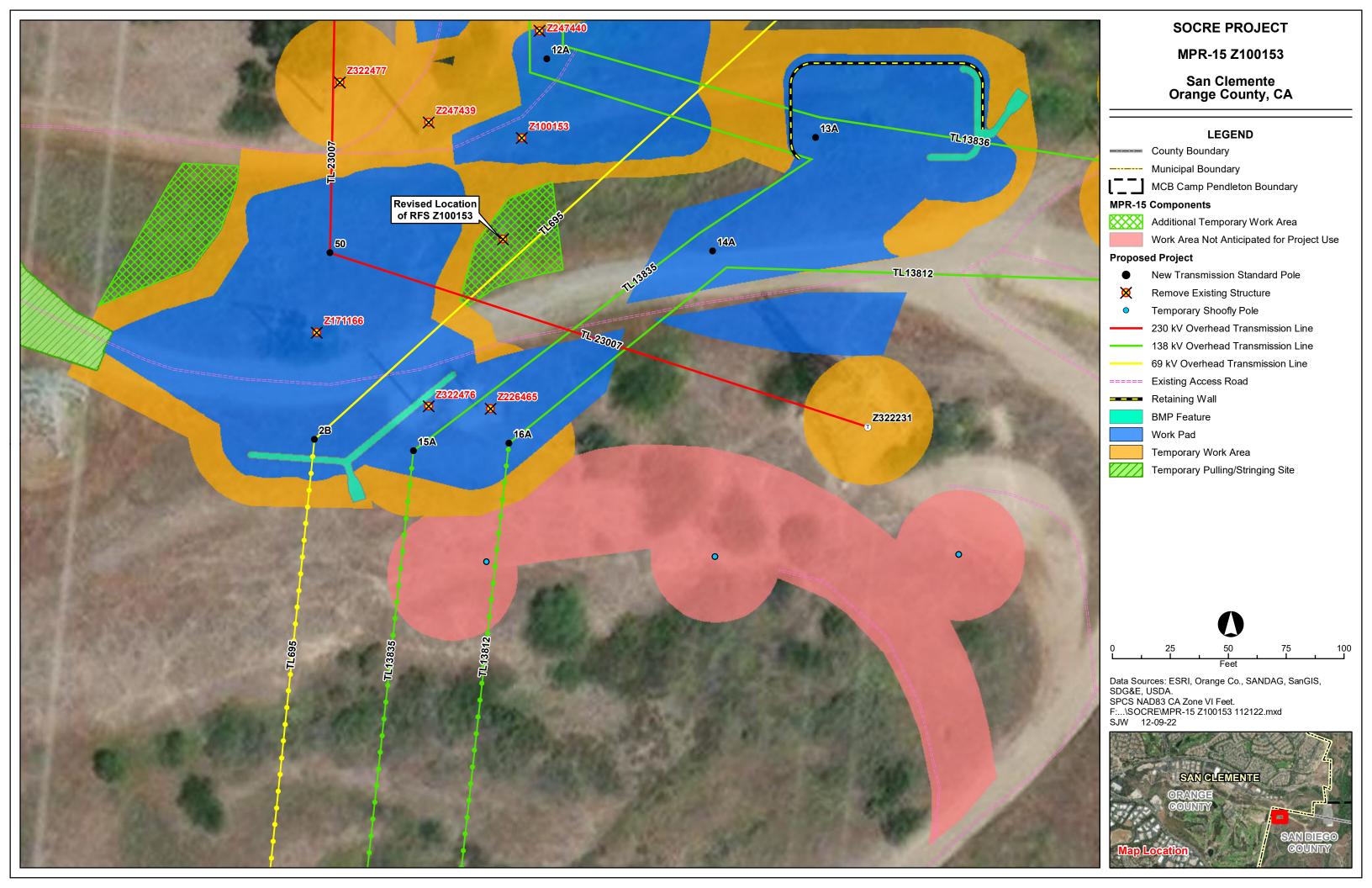
CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.		
		APM CUL-9: Discovery of Fossils		
		MM CUL-6: Qualified Paleontological Consultants		
A gangy		MM CUL-7: Paleontological Monitoring and Treatment Plan      Lipp of the MDD 15 work group would not require a general or tribal.		
Agency Consultation?	⊠ Y	Use of the MPR-15 work areas would not require agency or tribal consultation in relation to cultural or paleontological resources.		
	□N	However, if cultural resources are discovered within the MPR-15 work areas (or anywhere on MCBCP), SDG&E will notify MCBCP as required by the REIR.		
Traffic and Circulation	□ Y	There would be no additional construction crews or change in equipment utilized for MPR-15 that would not already be accounted for in NTP-7. There are no traffic control permits required for the use of the MPR-15 work areas, nor are they located adjacent to any public roads. Accordingly, traffic and circulation impacts resulting from the use of the MPR-15 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-15		
	⊠ N	work activities:		
		APM TR-4: Off Peak Deliveries		
Agency Consultation?	Y	The new temporary work areas would not require agency consultation relating to traffic and circulation.		
	⊠ N			
Air Quality	☐ Y	The use of the MPR-15 temporary work areas would not result in new significant impacts or a substantial increase in the severity of impacts		
	⊠N	as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities or equipment proposed as part of this MPR-15 request.		
Agency Consultation?	□ Y	The new temporary work areas would not require agency		
Consultations	⊠ N	consultation relating to air quality.		
Noise and	□ Y	The MPR-15 work areas are not in proximity to any sensitive		
Vibration	⊠ N	receptors (nearest sensitive receptor is over 1,100 feet away). In addition, MPR-15 does not involve the installation of any new		
		facilities, the performance of any new activities or the use of any new equipment. Therefore, utilization of the MPR-15 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?	⊠N	consultation relating to noise and vibration.		

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.		
Aesthetics/ Visual Resources	<ul><li>□ Y</li><li>⊠ N</li></ul>	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-15 work areas. The proposed temporary work areas do not contain any native vegetation of aesthetic resources, and 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-15 work areas would not result in a substantial increase in severity or a new significant impact beyond what was 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 MM would be implemented for MPR-15 work activities:		
		<ul> <li>APM AES-1: Clean Work Areas</li> <li>APM AES-2: Restoring Disturbed Areas</li> <li>MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions</li> </ul>		
Agency Consultation?	<ul><li> Y</li><li> N</li></ul>	The new temporary work areas would not require agency consultation relating to visual resources.		
Vegetation and Wildlife	□ Y □ N	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 ( <i>Brassica nigra</i> ) and bromes ( <i>Bromus sp.</i> ). The proposed work areas do not contain any sensitive biological resources		
		consistent with the Project's FEIR Section 4.4.  Vegetation trimming will take place as needed within the work areas. The vegetation that exists within the work areas has a high concentration of non-native, invasive species and does not contain any sensitive species. Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-15 work areas, 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:		
		<ul> <li>MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area.</li> <li>MM BR-2: Biological Monitoring.</li> <li>MM BR-3: Preconstruction Surveys.</li> <li>MM BR-4: Limit Removal of Native Vegetation Communities and Trees.</li> <li>MM BR-6: Migratory Birds and Raptors Impact Reduction Measures.</li> </ul>		

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.
		<ul> <li>MM BR-8: Western Burrowing Owl Impacts Reduction Measures</li> <li>MM BR-9: Invasive Plant Control Measures.</li> </ul>
Agency Consultation?	⊠ Y	Use of the new temporary work areas would not require agency consultation relating to vegetation and wildlife. However, if there are
	□N	any special-status species identified within the MPR-15 work areas (or anywhere on MCBCP), SDG&E will notify MCBCP in accordance with requirements in the REIR.
Wildfire	⊠ Y	The area in which the MPR-15 work areas are located is within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&E and its
	□N	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
		<ul> <li>engines with spark arrestors,</li> <li>Carrying emergency fire suppression equipment,</li> <li>Furnishing a water truck on or immediately adjacent to the proposed project work area,</li> <li>Restricting smoking and vehicle idling,</li> <li>Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and</li> </ul>
		<ul> <li>Conducting pre-activity tailgate meetings that include fire safety discussions.</li> </ul>
		All MPR-15 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. Therefore, the proposed MPR-15 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	SDG&E will coordinate with local emergency response agencies
Consultation?	□N	such as fire departments (including MCBCP fire departments) and police during NTP-7 construction, including the use of the MPR-15 work areas. Emergency access will be maintained throughout construction.

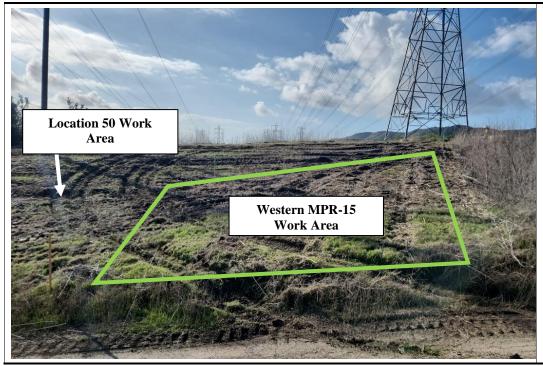
Approvals	Date	Name (print)	Signature		
San Diego Gas and Electric Project Manager		Omar Miranda		Reviewed	
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano		Reviewed	
CPUC Project Manager		Louis Torres		Approved Approved with conditions (see below) Denied	
For CPUC Compliance	Manager Use	Only			
☐ Refinement Approved ☐ Refinement Denied ☐ Beyond Authority					
Conditions of Approval or Reason for Denial:					
Prepared by: Fernand	lo Guzman, W	/SP, CPUC Compliance Mana	ger <b>Date</b> :		

# ATTACHMENT B MPR-15 Figure



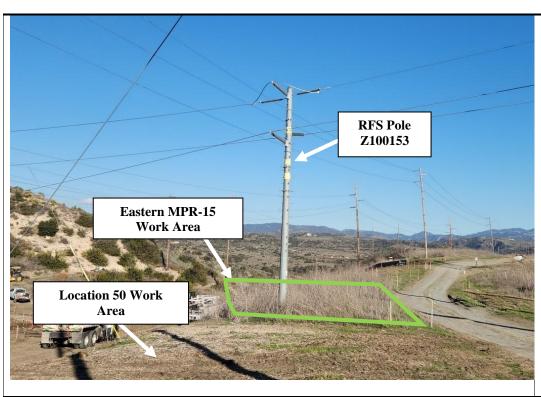
# **ATTACHMENT C MPR-15 Site Photographs**

## **MPR-15 PHOTO LOG**



### Photograph 1:

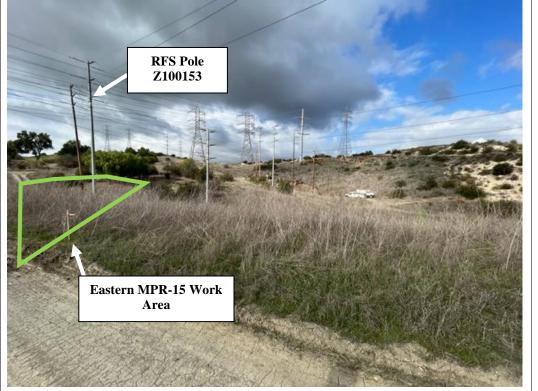
View of the western MPR-15 work area. This area is not anticipated for Project use but is being included as part of the corrective action for the compliance incident from November 29, 2022 where this area was mowed outside of work limits. Facing: South



## Photograph 2:

View of RFS Pole Z100153 and the eastern MPR-15 temporary work area. This additional work area will be needed to remove Z100153 since it was relocated outside of approved work limits in a non-Project related action. Facing: East

## **MPR-15 PHOTO LOG**



## Photograph 3:

View of RFS Pole Z100153 and the eastern MPR-15 temporary work area.

Facing: Northwest